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OMB PROPOSAL FOR SEVERE CUTS IN THE 1990 CENSUS

HEARING

BEFORE THE

JOINT ECONOMIC COMMITTEE
CONGRESS OF THE UNITED STATES

ONE HUNDREDTH CONGRESS

FIRST SESSION

AUGUST 7, 1987

Printed for the use of the Joint Economic Committee

U.S. GOVERNMENT PRINTING OFFICE
80-285 WASHINGTON : 1988

For sale by the Superintendent of Documents, Congressional Sales Office
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OMB PROPOSAL FOR SEVERE CUTS IN THE 1990 CENSUS

FRIDAY, AUGUST 7, 1987

CONGRESS OF THE UNITED STATES,
JOINT ECONOMIC COMMITTEE,
Washington, DC.

The committee met, pursuant to notice, at 10:14 a.m., in room SD-628, Dirksen Senate Office Building, Hon. Paul S. Sarbanes (chairman of the committee) presiding.

Present: Senators Sarbanes, Melcher, and Bingaman; and Representatives Hawkins, Scheuer, McMillan, and Dymally.

Also present: Paul Manchester, professional staff member.

OPENING STATEMENT OF SENATOR SARBANES, CHAIRMAN

Senator SARBANES. The committee will come to order.

I would say for the people standing in the back, I think there are some seats scattered in various places. You might be able to move in and take the remaining seats here and there.

This hearing has obviously attracted a great deal of interest and attention.

We are pleased also to have join the committee as our guest, Congressman Mervyn Dymally of California, who is the chairman of the House Subcommittee on Census and Population of the Committee on Post Office and Civil Service.

This hearing will focus on the potential effects of the Office of Management and Budget's proposal to drop from the 1988 census dress rehearsal roughly 30 questions that up to this time had been scheduled for inclusion in the 1990 census. We undertake the census in this country every 10 years, and we've been doing it since 1790.

The hearing reflects the longstanding concern of the Joint Economic Committee for the quality of the Federal statistical infrastructure. It has been the view of this committee that access to accurate, comprehensive, and timely data is indispensable to sound decisionmaking. Obviously, full and reliable statistical information does not, in itself, guarantee sound decisions or inevitably lead to sound decisions. Nevertheless, good statistics are part of the framework of decisionmaking in both the private and public sectors which makes sound decisions and sound policies more likely. It was precisely this concern that led the committee last year to hold extensive hearings on the quality of the Nation's economic statistics.

Those hearings which took place in March and April 1986—a little over a year ago—were, in part, a response to the widespread and growing concern that our capacity to provide critical statistical information was increasingly at risk.

Witnesses at those hearings, including former high-ranking officials of both the current and earlier administrations, were agreed on the central role played by the Federal statistical system and on the necessity not only of maintaining that system at its traditionally high level but of assuring its capacity to adopt to rapidly changing economic conditions.

As one witness pointed out, quoting Geoffrey Moore, the former Commissioner of the Bureau of Labor Statistics and currently director of the Center for International Business Cycle Research at Columbia University School: "If economic statistics are not continually improved, they will deteriorate."

The subject of today's hearing does not reach to the question of future improvement. It focuses on the very recent proposal by the Office of Management and Budget to reduce the number of questions scheduled for inclusion in the 1988 census dress rehearsal—the dress rehearsal for the 1990 census form—by about one-third. About two-thirds of the proposed cuts involve housing questions, while the remainder involve such vital issues as employment and unemployment, transportation, mobility, and energy.

The OMB message proposing this reduction was forwarded to the Census Bureau on July 24, just 2 weeks ago—in fact, 2 weeks ago today.

The Census Bureau and interested members of the public were given only 2 weeks—namely, until today—to respond. It is my strongly held view that in light of the sweeping nature of OMB's proposals, this was a very short time period, indeed.

Since the dress rehearsal is considered to be precisely what its name implies, any questions dropped from the dress rehearsal would presumably be dropped from the 1990 census as well.

Now it is important to understand that some of OMB's proposals involve reducing coverage from some questions from a census of households to a sample. The Census Bureau has one form that is given to all households. That's the short form. They also have a longer form which goes to a sample, one out of every six households.

OMB has proposed, in some instances, to shift a question from the census of households to the sample. But most of its proposals call for the outright elimination of questions, either from the census or from the proposed sample. These proposed changes are shown in four charts which we've prepared here, which show the questionnaire as proposed by the Census Bureau.

These three pages reflect the short form, which would go to all households. The first two pages, which is the form on the left and half of this one on the right, would remain intact.

On the third page, which is shown on the right of the second chart, four questions would be eliminated altogether and five would be reduced to sample status.

Now altogether this is the short form which would go to everyone in the country, would be the complete census. The changes made in the short form appear on the third page, the last page of that form except for the signature concluding page. Four questions, which are crossed out, would be eliminated altogether and five questions would be shifted into the sample.

So those are the proposed changes.

Now we will put up the additional pages, which constitute the sample. This would have gone to one out of every six households.

On page 4, which is shown on the left side of that third chart, 8 of the 11 questions, all dealing with housing, would be eliminated.

On page 5, as shown on the right-hand side of that chart, all of the seven questions would be eliminated.

On page 6, shown on the left-hand side of the fourth chart, three questions would be eliminated.

And on page 7, shown on the right side of the fourth chart, six questions would be eliminated.

So these are the proposals. First, we saw the changes that would be made in the form that went to everyone in the country. Second, we saw the changes proposed in the sample form that would go to approximately one out of every six households.

Since OMB's proposed reductions were first announced, the Joint Economic Committee has received numerous and vigorous protests from a wide range of statistics users in both the public and the private sector.

For example: State and local governments; and the Housing Statistics Users Group, representing a broad range of groups concerned with housing, including the Council of State Housing Agencies, the Mortgage Bankers, National Association of Housing and Redevelopment Officials, the Home Builders, the Realtors, Savings Institutions, National League of Cities, and the Urban Institute.

As I indicated at the outset, two-thirds of the cuts would be in the housing area.

Third, from the Highway Users Federation for Safety and Mobility. Their letter to the committee points out, and I quote.

> All levels of government annually spend about $65 billion on highways. Billions of public dollars are also spent on various forms of public transportation. These investments are guided, to an important degree, by transportation data from the census. Loss of that data could have consequences far outweighing any possible saving in census costs.

The research director of Allstate Insurance Co. points out that like other insurance companies, Allstate relies on vital data contained in the census in developing its market analysis system and says in his communication to us, "OMB proposes to eliminate this information, which is not available from any other source at any costs."

Before turning to our first witness, who is Ms. Wendy Gramm, Administrator of the Office of Information and Regulatory Affairs at the Office of Management and Budget, I wish to insert in the hearing record the communications received by the Joint Economic Committee with respect to the OMB proposals.

[The communications follow:]

U.S. HOUSE OF REPRESENTATIVES
SUBCOMMITTEE ON HOUSING AND COMMUNITY DEVELOPMENT
OF THE
COMMITTEE ON BANKING, FINANCE AND URBAN AFFAIRS
ONE HUNDREDTH CONGRESS
2129 Rayburn House Office Building
WASHINGTON, DC 20515-6052

August 6, 1987

Honorable Paul S. Sarbanes
Chairman
Joint Economic Committee
U.S. House of Representatives
Washington, D.C. 20515

Dear Paul:

Thank you for informing me of the hearings you are holding on August 7, 1987 regarding the Office of Management and Budget's proposal to delete most of the housing questions from the 1990 Census questionnaire.

I would appreciate it if you would accept the enclosed statement on this issue as my testimony and enter it in the record.

Given your active involvement in housing, I am sure you share my concern about OMB's proposal. I will support any steps you take in opposing it.

Sincerely,

Henry

Henry B. Gonzalez
Chairman

Enclosure
HBG:TM

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CHAIRMAN

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GERALD R. McMURRAY,
STAFF DIRECTOR

(202) 226-7054

Statement of Chairman Gonzalez Before the Joint Economic Committee August 7, 1987 Hearings on the Office of Management and Budget's Proposed Cuts in the 1990 Census Questionaire

Mr. Chairman, I am pleased to have the opportunity to testify before the Joint Economic Committee with regard to the proposal by the Office of Management and Budget to eliminate 19 of the current 28 questions regarding housing from the 1988 Census Dress Rehearsal questionnaire. It is my understanding that this questionnaire is used in preparation for the decennial census. Because of the nature of Census Bureau bureaucratic procedures, it is considerably more difficult to add questions to the questionnaire than it is to delete them; therefore, it is likely that the proposed changes, if approved, will be incorporated into the 1990 census questionnaire as well. As Chairman of the Subcommittee on Housing and Community Development, I am alarmed as well as dismayed at this prospect since important housing data would be affected, and would like to express my strong opposition to the proposal.

Comprehensive housing questions have accompanied the census questionnaire since 1940; and it is no coincidence that the inclusion of these questions was simultaneous with the passage and development of two landmark housing bills -- the Housing Acts of 1937 and 1949. The housing data obtained through the census has been the cornerstone of success and constructive change in our nation's housing programs. And it is obvious to me that, if we want to keep these programs viable, we need to continue gathering this data.

The Office of Management and Budget has offered several arguments in support of their proposal. None of the rationalizations, however, whether considered on their own merits or in conjunction the other reasons cited, convince me that the drastic measures proposed by OMB are necessary.

First, OMB contends that some of the data is not necessary in the detail provided by the census questionnaire, that there is no evidence that some of the data would serve important purposes, and that much of the data has not been used recently.

Apparently, OMB made this conclusion based on a recent GAO survey of the data used by federal agencies. However, the survey did not account for the data used by state and local agencies and by certain segments of the private sector. For example, Rhode Island recently completed a housing study which relied extensively on census data. And the mortgage banking industry and home builders use such data in testimony before my subcommittee on many occasions. The deletion of housing information from the census then, would severely curtail the ability of my subcommittee to utilize the vast information provided by the private sector and by state and local governments, information which is essential in assessing the housing needs of the nation.

Furthermore, because information was not used in the past does not imply it will never be used in the future. As the economic and social characteristics of our nation change, its housing needs change also. Limiting housing data to that which was used in the recent past would severely limit our ability to adapt our housing programs to these changing needs.

Second, OMB claims that much of the data currently obtained through the census is available from other sources. However, these other sources use census data as a starting point in gathering such information. The American Housing Survey, for example, which is conducted between censuses, uses housing data compiled from the decennial census both to determine how and where to conduct their survey and to facilitate interpretation of the data collected. Thus OMB's argument suffers from a faulty circular logic; census data was necessary in order to obtain the very information which OMB claims justifies shortening the census form.

While some of the housing information my subcommittee utilizes might be gathered from another source, it is only through the census that we can cross-correlate this information with data about specific income groups, minorities,and persons with shared familial characteristics. Such cross-correlation is essential in determining how our housing legislation affects individuals and in ensuring that we help effectively those who need assistance the most.

Third, OMB complains that some census data is unreliable. The census, however, is the fundamental and most reliable source of detailed informatiom about the nation's population. While some of the information becomes less reliable with time, the alternative is not having the information at all. And it is both less expensive and less complicated to update partially obsolete information than to gather the information from scratch. Furthermore, according to the Census Bureau, OMB's proposed deletions do not represent the questions which yield the most unreliable data.

Finally, OMB has cited its responsibilities under the Paper Reduction Act to eliminate the costs and time-consuming procedures unnnecessary to gathering data. It is doubtful, based on the information I have, that significant savings in these areas could be achieved.

According to the Census Bureau, the housing questions OMB has recommended be deleted are not ones which require the most work from census officials. These questions are asked of each household, not of each person in the household, as some questions are. Nor are housing questions ones which people are most loath to answer; thus they do not require as much follow-up from officials. Overall, the Bureau has estimated that the proposed deletions, which represent roughly 50% of the census questionnaire, would reduce the burden of conducting the census by only 10%. The paperwork which would be saved simply does not justify the substantial loss of needed housing data.

Similarily, the Census Bureau estimates that OMB's proposed changes would save only $100 million while the total cost of the census is $2.6 billion. In fact, OMB's proposal would probably increase long-term costs. The Bureau of Labor, for example, has already objected that the proposed deletions would make it considerably more difficult, and more expensive, for them to compute the Consumer Price Index. And the Department of Housing and Urban Development has stated that the proposed deletions would make it considerably more difficult for them to accurately compute the fair market rent in a geographical area; HUD uses the FMR to determine its housing subsidy for some programs. According to one HUD official, the resulting inaccuracy would probably increase subsidy outlays. This is, I think, the ultimate irony: that OMB, whose name has, in recent years, become synonymous with budget cuts, should tender a proposal which would probably increase the federal deficit!

And this brings me to the heart of the issue. Why has OMB offered a proposal which would be counterproductive to its attempts to maintain low federal costs? Why has it proposed the deletion of data which contributes to the effective allocation of federal funds. And why have the experts, including officials from the Census Bureau, the National League of Cities, the U.S. conference of mayors, and HUD, all decried the OMB proposal publicly in the July 30, Washington Post?

The answer is that OMB's action does not stem from an objective desire to reduce costs and paperwork; rather, it reflects this Administration's hostility towards federal housing. It is no coincidence that the same administration which has actively sought cuts of over 300% in HUD assisted housing, from $24.9 billion to $7.5 billion, now seeks to reduce housing questions on the survey by over 200%. It is no coincidence that the administration which has publicly called for a moratorium on federal housing programs, now seeks to eliminate data which would enable my subcommittee to remain attentive to the need for new approaches to federal housing. And it is no coincidence that this attempt so closely follows the overwhelming passage, in both the Senate and the House, of housing bills which flatly reject the Administration's housing policy and which exceed the Administration's funding request for housing by over $5 billion. In truth, the OMB proposal represents this Administration's thinly veiled attempt to achieve through the census what they failed to achieve in the legislature -- the virtual elimination of federal housing as a national priority.

Mr. Chairman, no one knows the importance of political debate and compromise in a democracy more than me. My current housing legislation contains several provisions which were worked out in cooperation with my Republican colleagues and with the Administration. Constructive political debate however, requires information, and it is this kind of information which the OMB proposal would eliminate. I will not, therefore, stand idly by while this Administration surreptitiously undermines Congress' ability to carry out the work they are charged to do by their constituencies. I urge that this committee recommend, in the strongest possible terms, that OMB drop their proposal.

United States General Accounting Office

GAO

Fact Sheet for Congressional Requesters

May 1987

DECENNIAL CENSUS

A Comparison of the 1980 and 1990 Census Questionnaire Contents

GAO United States
General Accounting Office
Washington, D.C. 20548

General Government Division

B-222824

May 11, 1987

The Honorable Mervyn M. Dymally
Chairman, Subcommittee on Census
and Population
Committee on Post Office and Civil Service

The Honorable Constance A. Morella
Ranking Minority Member
Subcommittee on Census and Population
Committee on Post Office and Civil Service
House of Representatives

Your March 25, 1987, letter requested that we assist the subcommittee in its evaluation of the content of the 1990 census questionnaire. Subcommittee representatives asked us to compare the Census Bureau's submission to Congress on the 1990 questionnaire content dated March 27, 1987, with its 1980 questionnaire content submission dated April 4, 1977. The results of our comparison and a summary of the differences between the proposed 1990 questionnaire content and the 1980 census questionnaires are presented in appendix I.

Overall, the proposed 1990 content for both 100-percent and sample data is similar to that included in the 1980 census questionnaires,[1] except for the following major changes:

--Two topics have been added. Congregate housing[2] has been included in the 100-percent data and housing quality in the sample data. The latter was proposed for the 1980 questionnaire but was omitted from the final version due to concerns that the questions were not demonstrated to be reliable indicators of substandard housing and might hinder public cooperation.

--Nine topics have been dropped, two 100-percent items and seven sample items. Most of these topics related to the identification of housing units and indicators of housing quality.

---

[1] In 1980, a short questionnaire included 100-percent questions asked of all households to meet data needs at small area levels. Additional questions were included on a longer questionnaire sent to a sample of about 19 percent of households to satisfy other data needs.

[2] Congregate housing includes separate housing units where meals are included as part of the rent. For example, in facilities for the elderly, units often have kitchens but the residents may eat one or more meals in a common dining room.

--One topic, presence of a telephone, was moved from the sample data to the 100-percent data. The Bureau also plans to request telephone numbers with the 100-percent data for possible questionnaire follow-up.

In addition, Bureau officials said that they plan to revise other questions prior to submitting the actual 1990 census questions to Congress, as required, by April 1988.

Census data serves three main purposes: 1) to count the population every 10 years for the apportionment of the House of Representatives, as required by the Constitution; 2) to provide data needed to implement governmental programs; and 3) to meet demonstrated public needs. During planning of the 1990 census content, the Bureau received many requests from various data users to add items to the census questionnaire. At the same time, the Bureau is concerned about lower than expected response rates in the 1985 and 1986 test censuses which seem to indicate increasing reluctance on the part of the public to respond to census inquiries.

In developing the 1990 questionnaire content, the Bureau consulted with various data users, including many government agencies as well as academic, advisory, and local community groups. The Bureau also conducted tests using alternative questions and questionnaire formats to measure the accuracy and consistency of responses. Finally, the Bureau conducted studies to observe the participants' reactions to these various questions and formats and obtained suggestions on the need to improve the questionnaire's "user friendliness." A summary of the Bureau's process used to develop the 1990 questionnaire is included in appendix II.

While we did not evaluate whether the proposed topics should be included in the 1990 census, we did address the content of the 100 percent questionnaire in our prior report, Decennial Census: Issues Related to Questionnaire Development (GAO/GGD-86-74BR, May 5, 1986). We also recently reported on the use of 100 percent decennial housing data by local governments in our report, Decennial Census: Local Government Uses of Housing Data (GAO/GGD-87-56BR, April 8, 1987).

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this document until 30 days from the date of its issuance. At that time, we will send copies to the Senate Subcommittee on Federal Services, Post Office and Civil Service; other appropriate congressional committees; the Secretary of Commerce; and the Director, Office of

Management and Budget. Copies will also be made available to other interested parties upon request. If there are any questions about the information presented, please call me on 275-8387.

Gene L. Dodaro

Gene L. Dodaro
Associate Director

COMPARISON OF 1980 & 1990 CENSUS QUESTIONNAIRES
CONTENT SUBMISSIONS TO CONGRESS

100 Percent Population

1980 Proposed Content	1980 Final Questions[3]	1990 Proposed Content
Name	Name (1)	Name
Household relationship	Household relationship (2)	Household relationship
Sex	Sex (3)	Sex
Race	Race (4)	Race
Age	Age (5)	Age
Marital status	Marital status (6)	Marital status
Ethnic origin	Hispanic origin (7)	Hispanic origin
Total income in 1979	(Dropped)	

100 Percent Housing

1980 Proposed Content	1980 Final Questions	1990 Proposed Content
Access to unit	Access to unit (H5)	(Dropped)
Number of units in structure	(Moved to sample form)	Number of units in structure
	Number of units at address (H4)	(Dropped)
Number of rooms in unit	Number of rooms in unit (H7)	Number of rooms in unit
Plumbing facilities	Plumbing facilities (H6)	Plumbing
Tenure-owned or rented; cooperative/condominium	Tenure-owned or rented (H8); condominium (H9)	Tenure-owned or rented; condominium
Value of home or monthly rent	Value of home (H11), or monthly rent (H12)	Value of home or monthly rent
Vacancy status	Vacancy status (C1,C2,C3,D)	Vacancy status
		Telephone
		Congregate Housing

---

[3] The numbers in parentheses indicate the question numbers on the 1980 census questionnaires. The 980 questionnaires also included several questions called "screeners," which were used by the Bureau to identify specific data universes to improve population and housing coverage.

Sample Population (Content not included on 100-percent form)

1980 Proposed Content	1980 Final Questions	1990 Proposed Content
Social characteristics:		
Birthplace, year of immigration and citizenship	Birthplace (11), year of immigration and citizenship (12)	Birthplace, year of immigration and citizenship
Language spoken at home	Language spoken at home (13)	Language spoken at home
Education	Education (8,9,10)	Education
Migration status	Migration status (15)	Migration status
Disability	Disability (19)	Disability
Marriage and fertility	Marriage (21) and fertility (20)	(Dropped) Fertility
Veteran status	Veteran status (18)	Veteran status
	Ancestry (14)	Ancestry
	Activity 5 years ago (17)	(Dropped)
Economic characteristics:		
Employment and unemployment	Employment and unemployment (22,25,26,27)	Employment and unemployment
Occupation, industry, and class of worker	Occupation, industry, and class of worker (28,29,30)	Occupation, industry and class of worker
Commute to work	Commute to work (24)	Commute to work
	Place of work (23)	Place of work
Work experience and income in 1979	Work experience (31) and income in 1979 (32,33)	Work experience and income in 1989[4]

Sample Housing (Content not included on 100-percent form)

1980 Proposed Content	1980 Final Questions	1990 Proposed Content
Plumbing and equipment:		
Heating equipment and fuels	Heating equipment (H20) and fuels (H21)	Heating equipment and fuels[5]
Source of water and sewage disposal	Source of water (H16) and sewage disposal (H17)	Source of water and sewage disposal
Air conditioning and telephone	Air conditioning (H27) and telephone (H26)	(Dropped) (Moved to 100 percent form)
Autos, light trucks, and vans	Autos, light trucks, and vans (H28,H29)	Autos, light trucks, and vans

---

[4] One item from the 1980 question on work experience will be deleted in 1990—weeks looking for work in previous year.

[5] One of the three 1980 questions on fuels will be deleted in 1990—type of cooking fuel.

Sample Housing (continued)

1980 Proposed Content	1980 Final Questions	1990 Proposed Content
Structural and other characteristics:		
Kitchen facilities	Kitchen facilities (H23)	Kitchen facilities
Year structure built	Year structure built (H18)	Year structure built
	Year moved into residence (H19)	Year moved into residence
Stories in structure and elevator	Stories in structure and elevator (H14)	(Dropped) (Dropped)
Number of bedrooms and bathrooms	Number of bedrooms (H24) and bathrooms (H25)	Number of bedrooms (Dropped)
Farm residence	Farm residence (H15)	Farm residence
Housing quality	(Dropped)	Housing Quality
Shelter costs including utilities	Shelter costs (H30,H31,H32) utilities costs (H22)	Shelter costs including utilities
Ownership of second homes	(Dropped)	
	Number of units in structure and type of building (H13)	(Moved to 100 percent form

Summary of changes—1980 content submission to final 1980 questionnaire:

Topics dropped

- Total income in 1979
- Housing quality
- Ownership of second homes

Topics added

- Ancestry
- Activity five years ago
- Place of work
- Year moved into residence
- Number of housing units at address

Summary of changes—1990 content submission from 1980 questionnaire:

Topics dropped

- Weeks looking for work in previous year
- Activity five years ago
- Marital history
- Number of housing units at address
- Access to living quarters
- Stories in structure and presence of elevator
- Type of cooking fuel
- Presence of air conditioning
- Number of bathrooms

Topics added

- Congregate housing
- Housing quality

SUMMARY OF 1990 QUESTIONNAIRE CONTENT DEVELOPMENT

Consultations With Data Users

Federal Agency Data Users

-- The Bureau established 10 interagency working groups (IWG) by decennial data topic areas comprised of representatives from federal agencies to identify federal data needs.

-- The recommendations of the IWGs were reviewed by the Federal Agency Council which is comprised of high level federal officials under the chairmanship of the Office of Management and Budget.

Nonfederal Data Users

-- The Bureau held specialized conferences on the housing and the race and ethnicity questions with participants from academic, research, and ethnic groups.

-- The Bureau held a series of 65 local public meetings across the country with representatives from state and local governments, private industry, academia, and the general public.

-- The Bureau also solicited suggestions on 1990 questionnaire content through its data user news bulletin.

Testing and Evaluation for Questionnaire Content

Questionnaire Content Tests

-- A special test was conducted in Chicago in 1985 to assist in designing the race and Spanish origin questions for the 1986 National Content Test.

-- In 1986, the Bureau conducted the National Content Test, which is the major opportunity to test content on a national scale. The test included eight different questionnaires and tested alternative questions and questionnaire designs.

-- The Bureau conducted re-interview surveys with a small sample of respondents in the Chicago special test, the National Content Test, and the 1986 test census in Los

Questionnaire Content Tests (continued)

Angeles to measure the accuracy and consistency of responses.

-- In 1987, the Bureau plans to conduct a special purpose test of the race and Spanish origin questions nationwide.

-- In 1988, the Bureau will conduct a dress rehearsal, which will be the final opportunity to test questions for the 1990 census.

Focus Group Studies

-- A small number of participants in the 1985 test census in Tampa and the 1986 test census in Los Angeles and Mississippi were asked to comment on the questionnaires used in these tests.

-- The Bureau plans to conduct additional focus group studies in 1987 to further evaluate the race and Spanish origin questions.

Requests for copies of GAO reports should be sent to:

U.S. General Accounting Office
Post Office Box 6015
Gaithersburg, Maryland 20877

Telephone 202-275-6241

The first five copies of each report are free. Additional copies are $2.00 each.

There is a 25% discount on orders for 100 or more copies mailed to a single address.

Orders must be prepaid by cash or by check or money order made out to the Superintendent of Documents.

CENSUS BUREAU STATEMENT ON OMB'S PROPOSED CHANGES IN THE CONTENT OF THE 1990 CENSUS OF POPULATION AND HOUSING

On Friday, July 24, 1987, the Office of Management and Budget (OMB) informed the Census Bureau that roughly 30 questions should be dropped from questionnaires submitted for approval to be used in the 1988 Census Dress Rehearsal. About two-thirds of the proposed cuts are questions on housing characteristics; among the items that had been designated for the 100-percent component, two (rent and value) were eliminated from the census altogether and the remainder (except for units in structure) were moved to the sample component. Most of the housing questions identified for elimination--representing 15 subjects, or a majority of items on housing characteristics--were on the sample component. The remaining cuts proposed by the OMB include three employment questions, as well as items on commuting, migration, and fertility--all from the sample component (Attachment A).

Both the OMB and Census Bureau regard the content coverage of the Census Dress Rehearsal as a preview of the questions that will appear on the 1990 Census of Population and Housing. Therefore, the questionnaire changes proposed by the OMB--elimination of some items and movement of others from a 100-percent basis to the sample component of the census--would apply to the 1990 census as well.

In proposing the question deletions, as well as item shifts from the 100-percent to the sample component of the census, the OMB has cited its responsibility for administering provisions of the Paperwork Reduction Act, and the agency made the following additional points:

- A scarcity of documented evidence that the resulting data would serve important purposes--such as for policy planning, program enactment, or other broadly based public needs.
- Data resulting from some of the items are not necessary at highly localized geographical levels.
- Some data items are not required uniformly across the Nation.
- Some are available from alternate sources.
- And, some of the questions would yield data that would not be sufficiently reliable.

The questionnaires submitted to the OMB marked the conclusion of an extensive content development and testing program, and the questions were compatible with the Census Bureau's submission of the subjects of the 1990 census to the U.S. Congress on March 27, 1987 (Attachment B). We are informing you, therefore, of OMB's intended action. The content development process included methodical evaluation of the 1980 census; recommendations received at local public meetings across the Nation; consultation with minority and technical advisory committes; and identification of governmental data needs through interagency working groups and the Federal Agency Council. New or modified questions resulting from the development process were tested in the National Content Test, the test census program, and special-purpose surveys.

The OMB has requested that the Census Bureau respond to its proposed cuts in questions for the 1988 Dress Rehearsal (and, by implication, the 1990 census) by August 7, 1987. Should you care to express views about the proposed census content changes, you may contact Mr. Donald R. Arbuckle, 202-395-7340, at the OMB, by August 7. You should be prepared to furnish details--such as legislative citations, programmatic applications (at any governmental level), administrative orders, or requirements for cross-tabulating population and housing data--about your needs for the affected data elements. If they are used for funding allocation purposes, the applicable formula should be provided. It would be appreciated if copies of written communications on this matter were sent to Mr. William P. Butz, whose address is given below.

OMB Contacts

Donald R. Arbuckle
Office of Management and Budget
NEOB
17th Street between PA Ave. & H St., NW
Washington, DC 20503
202-395-7340

Alternate Contacts

Wendy Gramm, 202-395-3864
Dorothy Tella, 202-395-3093
Maria Gonzalez, 202-395-7313

Copies of Correspondence

William P. Butz
Associate Director for Demographic Fields
Bureau of the Census
Washington, DC 20233

Attachments

Attachment A

OMB's PROPOSED CENSUS CONTENT AND DELETIONS

1990 Census questions

1. 100% form

Population

1. Population count
2. Relationship
3. Sex
4. Race
5. Age
6. Marital status
7. Ethnicity

Housing

H1. Coverage
H2. Building description

2. Long form (sample of 1 in 6 or other sampling rate) additional questions

Population

8. Country of birth (Code)
9. Citizenship
10. Year moved to U.S.
11. School attendance
12. Last grade completed
13. Ancestry (Code)
15. Language other than Eng. (Code)
16. Age screener
17. Veteran status
18. Work disability
19. Mobility disability
21a. Work last week
22a-e. Commuting to work (Code)
28-30. Industry (Code)/occupation (Code)/ Class of worker
32-33. Income (Code)

Housing

H3. Number of rooms
H4. Plumbing facilities
H5. Condominium
H7. Presence of telephone
H8. Owner/renter
H10b. Congregate housing
H11a-b. Agricultural product sales
H14. Date building built
H19. Kitchen facilities

3. Delete from 100% and long form

Population

14. Residence 5 years ago (Code)
20. Fertility
21b. Hours worked last week (Code)
23-24. Transportation/time to work (Code)
25-27. Labor force
31. Work last year (Code)

Housing

H6. Screener for value of home
H7. Telephone number (back of form)
H9. Value of own home
H10a. Rent
H12. Source of water
H13. Public sewer
H15. Fuel for heating home
H16. Heating equipment
H17. Fuel used for heating water
H18a-d. Costs of utilities & fuels (Code)
H20. Number of bedrooms
H21. Number of automobiles
H22. Date moved in
H23. Real estate taxes (Code)
H24. Fire, hazard & flood insurance (Code)
H25a-d. Mortgage (Code)
H26. Junior mortgage (Code)
H27. Condominium fee (Code)
H28. Mobile home fees (Code)

Attachment B

UNITED STATES DEPARTMENT OF COMMERC
Bureau of the Census
Washington, D.C. 20233

OFFICE OF THE DIRECTOR

MAR 27 1987

Honorable Mervyn M. Dymally
Chairman, Subcommittee on Census
  and Population
Committee on Post Office
  and Civil Service
House of Representatives
Washington, DC 20515

Dear Mr. Chairman:

In accordance with Title 13, Section 141(f), United States Code, the Census Bureau is submitting the subjects that we plan to cover in the 1990 Census of Population and Housing and the types of information that we envision compiling.

The enclosed list of subjects results from a thorough examination of recommendations made by the general public; officials in Federal, state, and local governments; and members of the business and academic communities. Even though an awareness of data-user needs is a continuous process at the Census Bureau, we established a number of formal mechanisms to identify data needs for the next census. For example, we held a series of 65 public meetings throughout the country to seek advice on the content of census questionnaires and on the kinds of census data products that are most useful. We sponsored conferences with representatives of public and private organizations and of minority and ethnic groups to obtain information about their special data needs. Representatives of the Federal agencies gave us invaluable counsel through 10 subject-based interagency working groups that we formed. We worked closely with the Federal Agency Council on the 1990 Census, established by the Office of Management and Budget, to participate in the content development process. By forwarding their own recommendations and those of their constituents, the Members of Congress also formed a link in this communication chain.

During the process of reviewing recommendations from these sources, we identified requests for far more questions than we could include in the 1990 census. We evaluated many candidate items during the most intensive content-testing program in our history. Several broad principles guided the selection of the subjects in this submission:

- The content must be mandated in legislation or serve broad societal needs.
- The data must be needed for small geographical areas or for numerically small populations.
- The content must yield reliable data.

- o The subjects must be suitable for self-enumeration.
- o The length of the 1990 questionnaires must be no greater than the length of the 1980 census questionnaires.

Given these principles and considerations of cost and processing technology, we believe the subjects selected constitute a balanced set that will bridge the Nation's data needs into the twenty-first century. We included most of the subjects on the enclosed list in the 1980 census. In response to demographic trends and changing needs for data on social and housing conditions, however, we anticipate making changes in actual question wording and in response categories.

Subjects covered in the 1980 census, but not planned for 1990 include: weeks looking for work in previous year; activity 5 years ago (Armed Forces, college, or job); marital history; number of housing units at address; access to living quarters (directly from the outside or through another housing unit); number of stories and presence of elevator in structure; type of cooking fuel; presence of air conditioning; and number of bathrooms. Our discussions with data users revealed limited uses for these items.

We tentatively plan to include two new subjects in 1990--congregate housing and additional housing quality questions. Congregate housing refers to housing in which the cost of meals is included in the rent or obtained on a contractual basis. Inclusion of congregate housing reflects the broad interest of public policy planners in the aging and disabled populations and will improve the socioeconomic profiles of these groups. The Census Bureau is conducting further field tests of the new housing quality items. The analysis of the test data will be available by the end of this year, and we expect to make a final determination on the housing quality questions at that time.

As in past decennial censuses, the Census Bureau will tabulate the collected information at various levels of detail for the numerous jurisdictions and statistical areas of our Nation. As required by Title 13, our initial concern will be to tabulate the population of each state by December 31, 1990 for use in apportioning seats in the U.S. House of Representatives. By April 1, 1991, we will provide officials in each state with detailed population counts for use in legislative districting.

With respect to more extensive tabulations, the Census Bureau will compile and publish detailed data on the demographic, housing, social, and economic characteristics for the populations of larger geographic areas, such as states and the District of Columbia. We will tabulate similar but less detailed data for smaller areas, such as census tracts and blocks. While the inventory of statistical results from the 1990 census will be similar to that of 1980, we have redesigned our products program, chiefly by changing the sequence and type of printed reports, enabling us to issue the results earlier in the postcensus period. In addition, we are exploring the possible use of new data dissemination media, such as laser disks.

The information we have provided relates to the census of the 50 states and the District of Columbia. As required by Title 13, the 1990 census also will cover Puerto Rico, the Northern Mariana Islands, American Samoa, Guam, the Virgin Islands, and other areas of U.S. sovereignty or jurisdiction. We have been working with representatives from these areas and expect the subjects for these censuses to be similar to the stateside submission with modifications in response to the specialized data needs of the inhabitants of those areas.

We assure you that in 1990--the bicentennial year for our Nation's census--our coverage of census subjects will be responsive to the national interest.

Sincerely,

(Signed) John G. Keane

JOHN G. KEANE
Director
Bureau of the Census

Enclosure

SUBJECTS PLANNED FOR THE 1990 CENSUS OF POPULATION AND HOUSING

100-Percent Component

Population

Name
Household relationship
Sex
Race
Age
Marital status
Hispanic origin

Housing

Number of units in structure
Number of rooms in unit
Tenure—owned or rented; condominium
Value of home or monthly rent
Vacancy characteristics
Plumbing
Telephone
Congregate housing

Sample Component

Population

Social characteristics:
- Education—enrollment and attainment
- Place of birth, citizenship, and year of entry
- Ancestry
- Language spoken at home
- Migration
- Disability
- Fertility
- Veteran status

Economic characteristics:
- Employment and unemployment
- Occupation, industry, and class of worker
- Place of work and commuting to work
- Work experience and income in 1989

Housing

Heating equipment and fuels
Source of water and method of sewage disposal
Autos, light trucks, and vans
Kitchen facilities
Year structure built
Year moved into residence
Number of bedrooms
Farm residence
Housing quality
Shelter costs, including utilities

NOTE: Subjects covered in the 100-percent component will apply to all persons and housing units. Those covered by the sample component will apply to a portion of the population and housing units.

CITY OF ROCKFORD, ILLINOIS
MAYOR'S OFFICE
61104

JOHN F. McNAMARA
MAYOR

July 31, 1987

Mr. Donald Ar uckle
Office of Man gement and Budget
Old Executive Office Building
Washington, D C. 20503

Dear Mr. Arbu kle:

I am writing o voice strenuous objections to proposals to delete vital information f om the questions to be asked in the 1988 Census Dress Rehearsal. L ss of the data will negatively impact both local governments a d the private sector in their attempts to gauge local housing marke s and direct their financial resources. In addition, this proposed chan e in the Census will mark 1980 as the end of major trend data in housi g, transportation and migration.

Clearly, the ost surprising proposal is to delete questions concerning value of home and rent questions that have been asked since 1930. This information i essential for many jobs. It is necessary in the administratio of federal housing programs. It is a key element in developing tr nds within a community to show everything from growth areas to pote tial trouble spots to definite problem areas. It helps us target everyt ing from CDBG funds to code enforcement. And finally, these two ite s -- value and rent -- form the keystone of market studies done by every ne from local governments to churches.

Other questio s should at least be retained in the sample component of the Census. hose that help us to predict housing needs and potential housing probl m areas include cost of utilities and fuels, number of bedrooms, and date moved in. Items that are of importance in doing market studie of new housing include mortgage, junior mortgage, condominium f e and mobile home fee. The Health Department relies on the Census fo information on source of water and sanitary sewer. While they can obvi usly obtain maps from local sources showing where these are available the maps do not show where services are available but not used.

As for questi ns relating to population, residence 5 years ago provides an important eans of tracking migration. Transportation/time to work is needed fo transportation modeling, and for developing trends to assess the a ility of the local transportation network to carry current and future affic loads. Finally, while questions concerning labor force clear have their limitations, they are the only source we have

Mr. Donald Arbuckle
July 31, 1987
Page two

of this type of information on a small area (census tract) basis. This again is important in spotting potential and existing problem areas and, on a more positive note, areas that are on the upswing.

If the response to these concerns is that whoever needs the information can hire someone to collect it, you are in essence saying that communities that have the extra money to do this can participate in federal programs demanding this information; those who do not will be excluded. Compounding this would be the fact that, left to individual communities to collect, the information from one community may not be as reliable as that from another. Having housing and demographic information that forms the basis for applications for federal funds collected by a single entity -- the Bureau of the Census -- at least ensures a uniform measure of reliability.

I hope that OMB will reconsider its position on the Census, and take into account the potentially devastating effect such a move will have on local governments and their ability to measure the economic health of their communities and respond to requirements from the federal government for this information for various housing and block grant programs.

Sincerely,

John McNamara

John F. McNamara
Mayor

cc: Senator Alan Dixon
Senator Paul Simon
Representative Lynn Martin
William Butz, Bureau of the Census
National League of Cities
National Community Development Association

ANALYSIS AND FORECASTING, INC.
Demographic/Economic Consultants

P.O. Box 415
Cambridge, MA 02138
(617) 491-8171

George S. Masnick
Margaret C. O'Brien
John R. Pitkin

August 2, 1987

United States Senator Paul Sarbanes
Dirksen Office Building, Room 332
First and Consitution Ave., N.E.
Washington, D.C. 20505

Dear Senator Sarbanes:

I write concerning the hearings you have called for August 6 on the Office of Management and Budget's decision to drop about half of the scheduled questions from the 1990 Census.

Analysis and Forecasting, Inc., is a demographic consulting firm with a specialty in projections of households, families and housing. We have clients from Maine to California, including banks, public utilities and major consumer product companies. I have also done a major study for the U.S. Department of Housing and Urban Development projecting the number and type of households and their housing to the year 2000. The report on this study is in continuing demand by organizations in both the public and private sector.

Most of the studies we have done would have been either impossible or severely handicapped had the questions on OMB's list not been provided for the 1980 Census. None of these questions should be dropped from the 1990 Census.

I can rebut OMB's stated justifications based on my own experience.

1. The OMB doubts that the resulting data would serve important purposes, such as policy planning. I have developed, for H.U.D., projections of the number and type of households, including the age and marital status of parents and the number of children which they have. These projections could not have been made without detailed information on fertility, which is available from no other source. Are not projections of this kind vital in making policy in a whole variety of areas, including notably reform of the welfare system?

2. The OMB doubts that the items are needed at highly localized geographic levels. One study which my firm did was for a utility company in Southern California who needed to develop programs for residential energy conservation. In that area, energy needs vary tremendously over very short distances, depending on whether a particular area is in the coastal, mountain, valley or desert climate zones. Without highly localized, tract-level Census data, conservation needs could not have been accurately measured.

3. The OMB has identified some items it says are not required uniformly across the nation. It is precisely our ability to compare Census information on tenure, rent, value, residence five years ago, fertility and shelter cost items that has allowed me and other researchers to measure the effects on housing consumption of factors which do vary substantially across the nation, such as housing rent and value. Without uniform benchmarks area-to-area comparisons would obviously be impossible. (I might add that the American Housing Survey does not serve as a substitute for Census information on housing items, even for the large geographic areas which it identifies, because detailed Census housing data provide the statistical basis for the design of the AHS sample. Without detailed Census housing data the AHS will be much less reliable after 1990.)

4. Some of the targeted items may be available from alternate sources, the OMB argues. The key word here is "some." It is precisely the Census's inclusion of both housing and fertility items which permitted me to develop projections of the housing situation of different kinds of households, in the study I mention in (1), above. Examples of the need for data on the relationship between apparently unconnected variables abound. Many important relationships are not obvious and there is no substitute for the uniform statistical base provided by the Census.

5. The OMB believes that some questions would yield data that would not be reliable. House value is one of the most notoriously unreliable of the items on the Census. Yet there is considerable evidence that the average responses for any area or group of housing units corresponds closely to actual values. As a result, I among many other reseearchers on urban housing and real estate have used Census information on mean house values for decades.

Information such as the OMB proposes to eliminate from the 1990 Census is vital for the future economic and social vitality of the United States. We cannot afford to lose the information they would sacrifice in the name of efficiency. We are too large and diverse a nation to be forced to depend on national averages where detailed, often localized, information is needed.

Sincerely,

John R. Pitkin

John R. Pitkin
President

cc: Dan Melnick(Congressional Research Service)
OMB, Bureau of Census, Ass'n of Public Data Users

University Library
The University of Michigan
DOCUMENTS CENTER
Ann Arbor, Michigan 48109

August 3, 1987

Ms. Wendy Gramm, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
727 Jackson Place, N.W.
Washington, D.C. 20503

Dear Ms. Gramm:

I was absolutely shocked to learn the Office of Management and Budget has asked the Census Bureau to cut half of the questions from the 1990 Census. Of all of the executive branch agencies, the Census Bureau is probably the most responsive to the public. The Bureau has been holding public forums across the country for at least the past two years to solicit input on the 1990 Census questionnaire and data products. The questions being eliminated were the same questions determined by a variety of local, state, and federal government personnel, librarians, businesses, and academic to be essential. Questions such as value or rent of housing are more accurate for judging the wealth of a community than income, and the single most-asked Census question is the unemployment rate.

Essential subject reports, such as those on blacks, women, and the elderly, were cut from the 1980 Census due to lack of funds. The mid-decade Census was cut for lack of funds. Detailed Population Characteristics is already being cut from the 1990 Census due to lack of funds. Please don't cripple data users by eliminating essential statistical information needed for the business of running this country.

Sincerely yours,
Grace Ann York
Grace Ann York
Federal Documents Librarian

cc: The Honorable Carl Levin, Senator from Michigan
The Honorable Mervyn Dymally, Chair, Subcommittee on Census and Population
Patty Becker, City of Detroit Planning Commission
William Butz, Associate Director, Bureau of the Census

Allstate

Allstate Research and Planning Center
321 Middlefield Road
Menlo Park, California 94025
Phone: (415) 324-2721

August 4, 1987

The Honorable Paul Sarbanes
U. S. Senate
Washington, DC 20510

The Allstate Research and Planning Center is the research facility for Allstate Insurance. We are a pioneer census user in the business community. We were one of two corporations to purchase the entire 1960 Census tape set. We made extensive use of the 1970 tapes. Currently, we rely heavily upon the 1980 Census. OMB's deletion of half of the questions would seriously impair our marketing analysis and labor force planning.

Over the years we have invested considerable resources in the development of a marketing analysis index system for each of our insurance products, for the entire US, at the zipcode and census tract level. The calculation of the indexes uses tract level data which includes the following:

- Rent and value of housing
- Residence five years ago
- Mode and travel time to work
- Labor force participation
- Number of automobiles
- Years moved into unit
- Housing data on a universe basis

OMB proposes to eliminate this information, which is not available from any other source at any cost.

This marketing analysis system allows us to better understand our markets, deliver insurance products more efficiently, and lower costs to the consumer. Obviously, we are not the only company to use the Census in this manner. Current trends reveal that markets are becoming fragmented. There are many more market segments today than a decade ago. A complete 1990 census would be available to all as a marketing tool, which will foster more competition and lower consumer insurance costs.

We have always been a leader in fostering affirmative action planning, even though there are no federal or state regulations or court order that require us to do so. We have seen a large payoff from pursuing these goals. For Human Resources planning, we have developed a Minority Employment Market report system. The reports analyze 1980 census tract information about the race, sex, age, occupation and education characteristics of the labor force. Seventy occupations and seven race categories are involved. The system allows the labor market to be defined in terms of commute time/distance around an employment site.

August 4, 1987

Page 2

The system also utilizes the 1980 census/EEC special file for additional detail at a more aggregate level. OMB proposes to eliminate the necessary information on:

Hours worked last week
Mode and travel time to work
Labor force activity
Weeks worked last year

This information is not available from any other source. Our development of proactive, affirmative action planning pioneering system would be lost.

Current demographic trends point to a labor shortage in the 1990s. It will be more important in the future to know labor force activity by census tracts to best locate new facilities, and continue leadership in affirmative action.

I request that OMB permit the existing 1990 census questionnaire to be kept as is. No questions should be deleted. Housing data should be kept on a 100% basis.

Sincerely,

Philip M. Lankford
Research Director

PML:irc

DAYTON HUDSON CORPORATION

777 Nicollet Mall
Minneapolis, Minnesota 55402
612/370-6948

August 4, 1987

Congressman Paul Sarbanes
Dirksen Senate Office Building, Room 332
Washington, D.C. 20510

Dear Congressman Sarbanes:

I learned last week that the Office of Management and Budget is considering the elimination of up to 20 questions from the 1990 census questionnaire. These include items on transportation, labor force, housing, five-year migration, and fertility. These changes are of concern to me for both Dayton Hudson Corporation, one of the nation's largest retailers (1986 sales of $9.3 billion), and for the good of business in general. When I heard of this action, I and many of my colleagues in the retail and shopping center industry immediately wrote to Mr. James Miller and Mr. Donald Arbuckle urging that they reconsider this proposal. A copy of my letter is enclosed.

I have just learned that you are conducting hearings on this subject on August 6, 1987. It is too late to contact these same business representatives to send you their concerns. I urge you to contact Mr. Miller, Mr. Arbuckle, Ms. Gramm, Congressman Dymally, and Congresswoman Morella to learn of the seriousness this issue raises to those of us in the private sector.

I also serve as the Chairwoman of the Committee on Business Demography for the Population Association of America. Our membership works in businesses ranging from airlines to newspapers, retailers to auto manufacturers, insurance companies to food processors. Consistent census data are vital to each industry. The news that the Office of Management and Budget is reconsidering the questionnaire items at this late date without adequate response time from the public is unsatisfactory. I urge you not to eliminate the above mentioned items from the questionnaire.

Thank you for reconsidering this issue.

Sincerely,

Joan Finch

Joan G. Finch
Manager, Area Research and Planning
Dayton Hudson Corporation

cc: Mr. James C. Miller
Mr. Donald Arbuckle
Wendy Lee Gramm
Congressman Mervyn M. Dymally
Congresswoman Constance A. Morella

Joan !

DAYTON HUDSON CORPORATION

777 Nicollet Mall
Minneapolis, Minnesota 55402
612/370-6948

July 31, 1987

Mr. James C. Miller, Director
Office of Management and Business
Old Executive Office Building
Washington, D.C. 20503

Mr. Donald Arbuckle
Office of Management and Business
New Executive Office Building, Rm. 3228
726 Jackson Place NW
Washington, D.C. 20503

Dear Mr. Miller and Mr. Arbuckle:

Dayton Hudson Corporation is among the nation's largest retailers with 1986 sales in excess of $9 billion and over 500 stores nationwide. Reliable, consistent census information is critical in our ability to plan strategically and to remain a strong factor in the communities in which we do business.

It has come to my attention that the Office of Management and Budget is considering the elimination of up to 20 questions from the 1990 census questionnaire. These include items on transportation, labor force, housing, five-year migration, and fertility. All of these items are very important to Dayton Hudson's planning and research efforts, as well as to the retail and shopping center industry. We have made considerable use of these items from past censuses and depend upon their continuation in the 1990 census for a consistent information base over time.

I was quite surprised that OMB is considering these changes at this late date. Dayton Hudson participated actively some time ago when the Census Bureau solicited our input for the content of the 1990 census. We were satisfied with the Census Bureau's final recommendation on the 1990 questionnaire. The news that the Office of Management and Budget is reconsidering the questionnaire items without adequate response time from the public is unsatisfactory. I urge you not to eliminate the above mentioned items from the questionnaire.

Thank you for reconsidering this issue.

Sincerely,

Larry E. Carlson
Vice President, Area Research and Planning
Dayton Hudson Corporation

cc: Wendy Lee Gramm, Office of Management and Budget
Congressman Mervyn M. Dymally
Congresswoman Constance A. Morella

DAYTON HUDSON CORPORATION
777 Nicollet Mall
Minneapolis, Minnesota 55402
612/370-6948

July 31, 1987

Mr. James C. Miller, Director
Office of Management and Business
Old Executive Office Building
Washington, D.C. 20503

Mr. Donald Arbuckle
Office of Management and Business
New Executive Office Building, Rm. 3228
726 Jackson Place NW
Washington, D.C. 20503

Dear Mr. Miller and Mr. Arbuckle:

I have just learned that the Office of Management and Budget is considering the elimination of up to 20 questions from the 1990 census questionnaire. These include items on transportation, labor force, housing, residence five-year migration, and fertility. These changes are of concern to me for both my own company and for the good of business in general.

All of the 20 items are very important to Dayton Hudson Corporation, one of the nation's largest retailers, as we make decisions for our future. I have made considerable use of these items from past censuses and depend upon their continuation in the 1990 census for a consistent information base over time. Dayton Hudson Corporation participated actively when the Census Bureau solicited our input for the content of the 1990 census. We were satisfied with the Census Bureau's final recommendation on the 1990 questionnaire.

I also serve as the Chairwoman of the Committee on Business Demography for the Population Association of America. Our membership works in businesses ranging from airlines to newspapers, retailers to auto manufacturers, insurance companies to food processors. Consistent census data are vital to each industry. The news that the Office of Management and Budget is reconsidering the questionnaire items at this late date without adequate response time from the public is unsatisfactory. I urge you not to eliminate the above mentioned items from the questionnaire.

Thank you for reconsidering this issue.

Sincerely,

Joan G Finch

Joan G. Finch
Manager, Area Research and Planning
Dayton Hudson Corporation

cc: Wendy Lee Gramm, Administrator
Congressman Mervyn M. Dymally, Chairman
Congresswoman Constance A. Morella

CITY OF DES MOINES
OFFICE OF NEIGHBORHOOD
DEVELOPMENT
CENTRAL ADVISORY BOARD
ARMORY BUILDING
EAST FIRST AND DES MOINES ST.
DES MOINES, IOWA
[illegible]

ALL-AMERICA CITY [illegible]

August 4, 1987

Mr. Donald Arbuckle
Assistant Chief of Commerce and
 Lands Grant
New Executive Office Building
Room 3228 ·
716 Jackson Place, NW
Washington, DC 20503

Dear Mr. Arbuckle:

The City of Des Moines Office of Neighborhood Development has been advised that OMB has recommended to cut approximately 30 questions which were to be included in the 1988 Census Dress Rehearsal, in preparation for the 1990 Census.

The proposed cuts will have a negative effect on the ability of the City of Des Moines to ascertain its economic health. Specifically, this lack of information may adversely effect the City's entitlement allocation of Community Development Block Grant funds.

Des Moines, like many other urban communities, is faced with the problems of a deteriorating tax base and an aging housing stock. Data provided by the Census on housing conditions is essential to the City in the development of its plans to allocate limited resources to meet the City's problems.

I would strongly encourage you to reconsider your recommendation to eliminate the approximately 30 questions from the 1988 Census which provide essential census data to the City of Des Moines.

If you have any questions or need additional information, please advise.

Richard J. Wright
Richard J. Wright, Administrator
Neighborhood Development

/elw
cc: City Manager
 National League of Cities

MARKET STATISTICS
PRODUCERS OF THE SURVEY OF BUYING POWER

Edward J. Spar
President

August 4, 1987

The Honorable Paul Sarbanes
Chairman
Joint Economic Committee
United States Congress
Washington, D.C.

Dear Senator Sarbanes:

Attached is a letter sent to Mr. Donald Arbucke of the Office of Management and Budget regarding OMB's proposal to eliminate certain questions from the 1990 Census. I request that this letter be included in the record of this hearing. Thank you.

Sincerely,

Edward J.

Home Office: 633 Third Avenue, New York, NY 10017 • (212) 986-4800
A Division of Bill Communications

MARKET STATISTICS
PRODUCERS OF THE SURVEY OF BUYING POWER

Edward J. Spar
President

July 31, 1987

Mr. Donald Arbuckle
Office of Management and Budget
New Executive Office Building
726 Jackson Place, N.W.
Washington, D.C. 20503

Dear Mr. Arbuckle

To put it plainly sir, I am shocked and dismayed at your proposed attempt to eliminate crucial questions from the 1990 Census questionnaire.

Market Statistics produces the annual Survey of Buying Power, which reaches over 60,000 marketing and sales executives around the country each year (a copy of which is enclosed). We are also consultants to hundreds of organizations, many of whom are Fortune 500 companies. Therefore, we are very familiar with the information needs of thousands of companies. These companies desperately need the information that you are proposing to delete. Put another way, sir, you are single handedly attempting to make American Industry less capable of marketing its products efficiently.

For example, the migration patterns of Americans is extensive. Therefore, the Census question relating to residence five years ago is crucial in order for companies to plan for:

* Sales territory evaluation and revision
* Sales compensation planning
* Strategic planning
* New plant or site locating
* Marketing and advertising allocations

among many others.

The housing questions relating to value of home, rent, date moved in and others are crucial to thousands of companies who either build homes, supply the material to builders, sell merchandise for renovations at wholesale or retail, and countless others.

Home Office 633 Third Avenue, New York, NY 10017 • (212) 986-4800
A Division of Bill Communications

Each question which you propose to eliminate plays a vital role in planning for some area of the private sector. Hundreds of examples could be given .

The users of the information are fully aware of the limitations of the data in terms of sample sizes and how this affects geographic reliability. Good businesses stay in business by understanding what they are using - under the assumption that they have something to work with. Now you are proposing to eliminate small, medium and large companies ability to make critical marketing, sales, advertising, and strategic planning decisions.

At a time when we are agonizing over the problems facing American Industry, you are planning to make their problems even more difficult to solve. Information about the market place is one of the most important assets that companies have. Your attempt to eliminate this information is harmful and tragic. I cannot stress strongly enough how important Census information is to the health of the American economy.

I strongly urge you to withdraw your proposal to delete critical questions from the 1990 Census endeavor.

Sincerely,

Edward J

encl.

cc: Mrs. Wendy Gramm
Administrator, OIRA
OMB

Mrs. Dorothy Tella
Chief Statistician
OMB

The Honorable Mervyn M. Dymally
Chairman, Subcommittee on Census
and Population

city
of NEWARK

post office box 390 / newark, delaware 19715-0390 / telephone 302-366-7000

CITY COUNCIL	
MAYOR	William M. Redd, Jr.
COUNCIL	
1st DISTRICT	Harold F. Godwin
2nd DISTRICT	Louise Brothers
3rd DISTRICT	Betty Hutchinson
4th DISTRICT	Allen E. Smith
5th DISTRICT	Ronald L. Gardner
6th DISTRICT	Olan R. Thomas
CITY MANAGER	Carl F. Luft
CITY SECRETARY	Susan A. Lamblack

Writer's Direct Dial Number: (302) 366- 7030

August 4, 1987

Mr. Donald Arbuckle
Office of Management & Budget
New Executive Office Building
726 Jackson Place, NW
Washington, D.C. 20503

Dear Mr. Arbuckle:

I am writing to express my concern regarding the proposed elimination of key housing and population questions from the 1990 Census long form. These questions are an essential source of economic, housing and population data for the City of Newark, Delaware at the census block level. This statistical information is used for the planning and development of strategies to enhance the well-being of our community. The City does not have the resources to collect similar data. If this information is not provided by the 1990 census, the City will lose a valuable planning resource. In light of the above, the City of Newark requests that the Office of Management & Budget reconsider its decision to delete these proposed questions from the census forms.

Thank you for your attention in this matter.

Sincerely,

Maureen F. Roser

Maureen F. Roser
Associate Planner

MFR:mc
cc: National League of Cities
Mr. William Butz, Bureau of the Census

Telephone 313/292-3800

R·L·POLK & CO.

MARKETING SERVICES DIVISION

6400 Monroe Boulevard • Taylor, Michigan 48180-1814

August 4, 1987

Ms. Wendy Gramm
Administrator
Office of Information & Regulatory Affairs
Office of Management and Budget
New Executive Office Building
727 Jackson Place N.W.
Washington, DC 20503

Dear Ms. Gramm:

It is my understanding that in its review of the 1988 Dress Rehearsal of the 1990 Census of Population and Housing the Office of Management and Budget (OMB) is considering dropping questions relating to . . .

- Rent and value
- Residence five years ago (the migration item)
- Fertility
- Hours worked last week (i.e. full time/part time)
- Mode and travel time to work
- Labor force activity (i.e. the unemployment rate)
- Weeks worked last year
- Number of automobiles
- Year moved into unit (i.e., length of residence)
- Several items regarding utilities
- All items regarding shelter costs
- Number of bedrooms

I consider all of these items to be important. Let me comment, however, on the social and commercial value of several items which we use most -- automobiles, migration, length of residence, and housing.

Over 100 Years of Serving Commerce and Industry

R. L. Polk & Co. publishes statistics on automobile and truck registrations and is an alternative source of the automotive information provided by the Census. There are often differences, however, between the locations and names in which vehicles are registered and the household ownership reported by the Census. The Census is necessary for us to observe these differences in small geographic areas (census tract, block groups and enumeration districts) every ten years in order to understand and interpret these effects.

Another important use we make of census data is in direct marketing and communications. This includes fund raising for health related, charitable and for issue-oriented organizations. The mobility and housing characteristics in small neighborhood areas are important in identifying who is most likely to contribute or to respond to an appeal.

The social and commercial value of these data far out weighs the savings, if any, OMB may realize from their deletion. They should be retained in the 1988 Dress Rehearsal questionnaire and in the 1990 Census.

Sincerely yours,

Leonard Quenon

Leonard Quenon
Vice President
Research Director
Marketing Services Division

/db

cc: W. D. Ford
P. Sarbanes ✓
D. Reigel
C. Levin
W. Butz
P. Becker

't. Shafrot

City of Rochester

Thomas P. Ryan, Jr.
Mayor

City Hall
Rochester, New York 14614

August 4, 1987

Donald Arbuckle, Assistant Branch Chief
Office of Management and Budget
New Executive Office Building
726 Jackson Place, NW
Washington, DC 20503

Dear Mr. Arbuckle:

As Mayor of the City of Rochester, I am gravely concerned with the Office of Management and Budget's directive of July 24th to delete nearly half of the proposed questions from the upcoming 1990 "dress rehearsal" census forms. It is paramount to the local delivery of effective and cost conscious services that Rochester have available an adequate baseline of information on population and housing conditions within our city. Strategic planning for the future social and economic health of our community will be in jeopardy if this directive goes into effect.

As an example, Rochester has recently retained a national market research firm which specializes in housing to develop housing policies that will guide Rochester through the next decade. Our success in measuring the policies effectiveness will depend on the statistical data obtained from the 1990 Census. According to the directive, two-thirds of the proposed cuts are questions on housing characteristics, with key data for rent and value being eliminated from the 1990 Census. With the demise of federal housing programs, local municipalites must assume a role which will be virtually impossible to address given the loss of all but one housing data element at the census block level.

As Mayor of Rochester I urge you to reconsider this paralyzing directive and reexamine the importance and significance of adequate data collection from the 1990 Census.

Sincerely yours,

Thomas P. Ryan Jr.,
Mayor

TPR/ec

xc: Senators, Daniel Patrick Moynihan, Alfonse D'Amato
Congresswoman Louise Slaughter
Congressmen Frank Horton, John LaFalce
Alan Beals, Executive Director National League of Cities
William Butz, Associate Director for Demographic Fields Bureau of Census

EEO Employer/Handicapped

Highway
Users Federation
FOR SAFETY AND MOBILITY

OFFICE OF THE EXECUTIVE VICE PRESIDENT

August 5, 1987

The Honorable Paul S. Sarbanes
Chairman
Joint Economic Committee
SD-332 Dirksen Senate Office Bldg.
Washington DC 20510

Dear Senator Sarbanes:

The Highway Users Federation was pleased to learn that you will hold hearings on the proposal from OMB to eliminate most transportation questions from the 1990 Consensus. As the attached letter indicates, we are deeply concerned with this proposal and would welcome an opportunity to appear before your Committee.

Sincerely,

Carlton C. Robinson

Enclosure

cc: Paul B. Manchester

1776 Massachusetts Avenue, N.W., Washington, D.C. 20036 (202) 857-1200

Highway
Users Federation
FOR SAFETY AND MOBILITY

OFFICE OF THE EXECUTIVE VICE PRESIDENT

August 4, 1987

Mr. James C. Miller, III
Director
Office of Management & Budget
Old Executive Office Building
Washington, DC 20503

Dear Mr. Miller:

This is to express our deep concern that your office is reportedly urging the removal of all or nearly all transportation questions from the 1990 Census.

All levels of government annually spend about $65 billion dollars on highways. Billions of public dollars are also spent on various forms of public transportation.

These investments are guided to an important degree by transportation data from the census. Loss of that data could have consequences far outweighing any possible saving in census costs.

The Highway Users Federation represents a large segment of American business which supports good and economic highway transportation. We hope that you will provide us an opportunity to counsel with your technical staff before any decision is reached to reduce this important data resource.

Sincerely,

Carlton C. Robinson

Carlton C. Robinson

cc: John G. Keane, Director, Bureau of Census
Honorable James Howard
Honorable Quentin Burdick

1776 Massachusetts Avenue, N.W., Washington, D.C. 20036 (202) 857-1200

525 School St., S.W., Suite 410
Washington, D.C. 20024-2729 USA
Telephone: (202) 554-8050
Telex: 467943 ITE WSH CI

ite

INSTITUTE OF TRANSPORTATION ENGINEERS

Honorable Paul Sarbanes
Chairman, Joint Economic Committee
United States Senate
SD-332 Dirksen Senate Office Building
Washington, DC 20510-2002

August 5, 1987

Dear Mr. Sarbanes:

In reference to the Joint Economic Committee hearing this Friday on the United States census, the Institute of Transportation Engineers would like to emphasize the importance of the transportation related questions in the census. Census data is essential to transportation professionals in developing solutions to the current severe traffic congestion problems in cities all over the United States. The Institute is the educational and scientific association of professionals engaged in planning, designing, operating, and maintaining the surface transportation systems of the world. We have over 8,500 members in 70 countries, including 7,000 who practice their profession in the United States. The Institute represents transportation engineering and planning professionals employed by local and state governments, metropolitan planning organizations, the federal government, and consulting firms.

The United States census has become an increasingly valuable and irreplacable source of data on which to base the transportation planning process. Since the 1960's, rising costs and diminishing local resources have forced most urban area planning agencies to forego their own large-scale data collection. Concurrent with the decline in local large-scale data gathering, planning agencies have faced increasing pressures from decision makers to base their analyses and recommendations on up-to-date information. Improvements both in the level of detail sought in the 1980 census questionnaire and in geographic coding of the data obtained by the census now afford transportation professionals a database that can fill most of the void left by the slowdown in local information gathering.

The 1980 census provided both socio-demographic and journey-to-work information, data that are essential to analysis of current conditions, trend evaluation, and accurate forecasting. An example of the value of application of the data is the attached report, "Commuting in America", put together as the result of a public-private sector cooperative which includes the Federal Highway Administration, many of the regional metropolitan planning organizations, and a consortium of organizations including the Institute.

The census provides information about the duration of journeys-to-work, major work-trip movements, and modes of travel used. Such information provides planners with insight into shifts of these characteristics during recent years. The census is a valuable tool for understanding travel-generating characteristics of residential and employment zones and the patterns of travel between these zones.

Transportation professionals today use 1980 census data to analyze and determine needed improvements for:

- o transportation accessibility for specific population segments,
- o transit service,
- o land-use trends,
- o corridor service that uses reserved lanes for high occupancy vehicles
- o bus route in central business districts,
- o improving multimodal travel services for work trips.

The attached Institute informational report, Use of Census Data in Transportation Planning, can provide you with more information on this subject.

In representing the transportation engineering and planning profession, the Institute of Transportation Engineers appreciates your consideration of the impacts of eliminating the transportation related questions from the 1990 United States census as well as future censuses. The entire travelling public, in addition to transportation professionals, would be negatively affected by such a reduction in the census data. We further request that a hastily made decision on the reduction of transportation related census data be forestalled so that adequate time for input can be provided and that the benefits and disbenefits can be fully assessed.

Sincerely,

Thomas W. Brahms
Executive Director

cc: Paul Manchester, Joint Economic Committee staff

SENT BY:COMMERCE ; 8- 5-87 4:04PM ; 4442808→ CCITT G3:# 1

DEPARTMENT OF COMMERCE
CENSUS AND ECONOMIC INFORMATION CENTER

TED SCHWINDEN, GOVERNOR

CAPITOL STATION
1424 9TH AVENUE

STATE OF MONTANA

(406) 444-2896

HELENA, MONTANA 59620-0401

DATE: Wednesday, August 05, 1987

TO: Senator Paul Sarbanes (202) 224-1651 fax

FROM: Patricia Roberts

RE: FAX TRANSMISSION

Number of pages in transmission: 7

If this FAX transmission is not being received properly, please call (406) 444-2896.

The Commerce Department FAX number is (406) 444-2808, and is equipped with a Xerox Telecopier 7010.

Thank you.

SPECIAL INSTRUCTIONS:

Material for hearing on Thursday, August 6th, 1987, 9:30 a.m. in room 628, Dirkson Office Building. The hearing is concerned with OMB's proposed reduction in the number of questions on the 1988 dress rehearsal questionnaire. Copies of this material will be sent by mail to the Office of Management and Budget, the Bureau of the Census, and the Association of Public Data Users.

SENT BY:COMMERCE ; 8- 5-87 4:05PM ; 4442808→ CCITT G3;# 2

DEPARTMENT OF COMMERCE
TRANSPORTATION DIVISION

TED SCHWINDEN, GOVERNOR
1424 9TH AVENUE

STATE OF MONTANA

(406) 444-3423
HELENA, MONTANA 59620-0401

August 5, 1987

Wendy Gramm, Administrator
Office of Information & Regulatory Affairs
Office of Management and Budget
New Executive Office Building
727 Jackson Place N.W.
Washington, DC 20503

Dear Ms. Gramm:

It is my understanding that the elimination of Questions 24a through 24d of the 1990 census is being considered.

On behalf of the Passenger Assistance Bureau of the Montana Department of Commerce, I would recommend that you not drop question 24a through 24d. The data collected by the Census Bureau in answer to that question is extremely helpful to us in assisting local communities, whether they are large or small, in meeting their public transportation needs.

Passenger Bureau staff have assisted local transportation systems in sixty-plus communities in Montana.

Staff have advised these communities in such areas as: public transportation; para-transit; home to work program; van pooling; car pooling; and coordinating with local taxi service.

Staff have assisted communities in determining the following: number of passengers per mile; cost of passenger per mile; cost per one-way trip; cost per hour; and cost per vehicle mile.

The data collected on the census report is extremely useful to us and all transit providers in providing the cost of service.

I thank you for considering the above information before making your decision.

Sincerely,

for Patricia Saindon

Patricia Saindon, Chief
Passenger Bureau

cc: Donald R. Arbuckle

SENT BY:COMMERCE ; 8- 5-87 4:06PM ; 4442808→ CCITT G3:# 3

University of Montana
Bureau of Business and Economic Research • Missoula, Montana 59812 • (406) 243-5113

August 4, 1987

Donald R. Arbuckle
Office of Management and Budget
NEOB
17th Street between PA Ave & H St., N.W.
Washington, D.C. 20503

Dear Mr. Arbuckle:

I have reviewed the proposed deletion of items from the 1988 Census Dress Rehearsal. If these items are also deleted from the 1990 Census, they will have a significant impact on our ability to provide timely and accurate information for Montana decision-makers.

We have two programs here at the Bureau that are designed to provide economic forecasts and demographic information for Montanans. *Economics Montana* provides forecasts for statewide and substate economic activity, which are widely quoted in the press and mailed (at no charge) to over 200 users. The County Data Packages provide timely updates of demographic information for all Montana counties; almost 1,000 requests have been made in the last two years. The users of both programs include state and local officials, business people, and private individuals. Similar information is available from no other sources.

Both of these programs will be directly affected by the deletion of items 14, 20, 21b, 23-24, 25-27, and 31. The 1990 values would provide both a reliable benchmark for our forecasts and parameter estimates for our models.

I strongly urge you *not* to delete these items.

Sincerely,

PAUL E. POLZIN
Professor and Director
of Economic Forecasting

PEP:ko

DEPARTMENT OF REVENUE

TED SCHWINDEN, GOVERNOR
MITCHELL BUILDING
STATE OF MONTANA
HELENA, MONTANA 59620

August 5, 1987

The Honorable James C. Miller, III
Director
Office of Management and Budget
Washington D.C. 20503

Dear Mr. Miller:

It has been brought to my attention that the OMB is proposing major changes in the questions to be included in the 1990 Census. As a significant user of Census data, I feel these changes would be unfortunate.

My office is intimately involved in tax policy planning for the State of Montana. We provide information to policymakers that illustrates the effects of their policy options on taxpayers and state and local governments.

Census data provides the only source of valuable data in many instances. Examples of recent policy issues which relied on data that would be deleted under OMB's proposal include the creation of a homeowner property tax exemption and an income tax credit for rent paid. Census data had to be used to estimate for the revenue impacts on the various taxing jurisdictions and to illustrate the impacts on different types of taxpayers.

The OMB's proposed deletions, had they occurred in the 1980 Census, would have significantly reduced our ability to accurately estimate the impacts of these and other proposals.

I request that you reconsider your proposal. The information is used for important decisions and is not available from other sources.

Thank you for your consideration on this matter.

Sincerely,

Steven G. Bender, Chief
Research Bureau

SENT BY:COMMERCE ; 8- 5-87 4:08PM ; 44428084 CCITT G3;# 5

DEPARTMENT OF COMMERCE

TED SCHWINDEN, GOVERNOR
1424 9TH AVENUE

STATE OF MONTANA

(406) 444-3494
HELENA, MONTANA 59620-0401

August 5, 1987

The Honorable James C. Miller, III
Office of Management and Budget Director
Washington, D.C. 20503

Dear Mr. Miller:

This letter is in response to your office's proposed deletion of approximately 30 questions from the questionnaire for the 1988 Census Dress Rehearsal. I strongly oppose this action. I oppose it both on general and on specific grounds.

In general it is very unwise to subvert the carefully designed and executed process of choosing questions for the 1988 and 1990 Census questionnaires. As you may know, this process included a series of 65 public meetings held throughout the country, identification of U.S. Government needs through interagency working groups and the Federal Agency Council, along with other consultations with public and private organizations. The action by the OMB Desk Officer, Donald Arbuckle, in proposing the elimination of roughly 30 questions undermines the above described process.

The Decennial Census is the source for important and useful information that is not available elsewhere. The questions proposed for elimination are of this nature. These data are not available from alternate sources, but are vital for decisions at the state and local levels, many of which involve federal funding. The Census Bureau has ample documentation of these uses. I offer one example out of my own experience to illustrate the point.

In 1984, I produced population projections for the age group 65 and over, for each county in Montana. These projections were specifically prepared for the Montana Department of Health for use in their process of issuing certificates of need for new/expanded nursing homes. A certificate of need is required at least in part because much of the income of nursing homes comes from the Medicaid program. In order to produce county population projections for this age group, I needed historical data on migration by age. The only source for this kind of information was the 1970 and the 1980 Censuses of Population. Without this information it would have been impossible to make meaningful projections.

I strongly urge you to reverse the preliminary judgment to eliminate approximately 30 questions from the 1988 Census Dress Rehearsal Questionnaire. Thank you for your consideration in this matter.

Sincerely,

Phillip D. Brooks, Ph.D.
State Economist

DEPARTMENT OF NATURAL RESOURCES
AND CONSERVATION

TED SCHWINDEN, GOVERNOR
1520 EAST SIXTH AVENUE

STATE OF MONTANA

DIRECTOR'S OFFICE (406) 444-6699
HELENA, MONTANA 59620-2301

August 5, 1987

Wendy Gramm, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
727 Jackson Place N.W.
Washington, DC 20503

Dear Ms. Gramm:

DRNC just today learned of OMB's plans to drop a number of questions from the 1988 Dress Rehearsal census questionnaire. We cannot agree with OMB's assessment that these are not necessary. DNRC needs reliable information on housing characteristics and fuel uses that is not available from sources other than the Census. In particular, we use information on the utilities and housing stock in our analyses of energy conservation potential and of utility system loads and reliability. These studies are required for DNRC and region-wide conservation program planning and for the utility facility licensing process.

We realize that OMB has proposed that some of these questions be moved to the sample. However, in a state as sparsely populated as Montana, a sample size that is adequate for national purposes is likely to be inadequate for the type of analyses we do. Therefore, we request that OMB retain the questions on utilities and housing as proposed by the Bureau of the Census.

Respectfully,

Dr Lawrence P. Nordell, Acting Bureau Ch
for

Alan Davis
Chief, Planning and Analysis Bureau
Energy Division

AD/PC/jm

CC: Congressman Paul Sarbanes
William P. Butz

SENT BY:COMMERCE ; 8- 6-87 8:19AM ; 4442808→ CCITT G3;# 1

DEPARTMENT OF COMMERCE
CENSUS AND ECONOMIC INFORMATION CENTER

TED SCHWINDEN, GOVERNOR

CAPITOL STATION
1424 9TH AVENUE

STATE OF MONTANA

(406) 444-2896

HELENA, MONTANA 59620-0401

DATE: Wednesday, August 05, 1987

TO: Senator Paul Sarbanes (202) 224-1651 fax

FROM: Patricia Roberts

RE: FAX TRANSMISSION

Number of pages in transmission: 2

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Thank you.

SPECIAL INSTRUCTIONS:

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SENT BY:COMMERCE ; 8- 6-87 8:28AM ; 4442888→ CCITT G3:# 2

DEPARTMENT OF COMMERCE
LOCAL GOVERNMENT ASSISTANCE DIVISION

TED SCHWINDEN, GOVERNOR
COGSWELL BUILDING — ROOM C 211
CAPITOL STATION

STATE OF MONTANA

(406) 444-3757
HELENA, MONTANA 59620-0522

August 4, 1987

Honorable James C. Miller, III
Director
Office of Management and Budget
Washington, D.C. 20503

Dear Mr. Miller,

My office works with all Montana communities on community development, economic development, community planning, and infrastructure development matters. We are dismayed to learn of OMB's proposal to eliminate useful data from the 1990 U.S. Census. Elimination of this key data will have a substantial impact on the ability of Montana communities to redevelop and reindustrialize.

For example, the proposal to eliminate information on sewer and water hookups will make it more difficult to finance community water and sewer systems. Financiers and financial consultants use the information to put together financing proposals. Without improved water and sewer facilities Montana business and industry will not be able to expand.

You have proposed to eliminate transportation data such as "the number of cars owned", "method of transportation to work", and "time to work". This information is used to develop and improve community transportation systems. It is particularly helpful in designing bus systems, light rail systems, and individual business van pooling systems.

The proposal to only make census socioeconomic data available for political jurisdictions with a population of 2 million or more indicates a lack of sensitivity to the needs of rural Americans, in general, and all Montanans in particular. Since the entire population of the State of Montana is only about 800,000, your proposal will mean none of the data will be available for any of Montana's 479 communities.

The elimination of this important data will be false economy. To cut it out at the federal level will shift the responsibly to state governments, local governments, and the private sector. Project development costs will increase.

Taxes and private business costs charged the public will increase. Moreover, states, localities and businesses can not collect the information as cost effectively as the federal government. The personpower available for implementing the federal census can not be duplicated by any other governmental or private entity.

In summary, I urge OMB to reexamine the proposal to eliminate the census data cutbacks. The average citizen will lose -- not benefit -- from the data cutbacks.

Sincerely,

Robb McCracken
Robb McCracken
Administrative Officer
Community Technical Assistance Program

Office Of The Mayor
City of Seattle

Charles Royer, Mayor

August 5, 1987

Donald Arbuckle
Office of Management and Budget
New Executive Office Building
726 Jackson Place Northwest
Washington, D.C. 20503

Dear Mr. Arbuckle:

I learned today that OMB is demanding major cutbacks to the 1990 census which will negatively impact local governments.

I protest these arbitrary changes which I believe will not achieve the economies you desire, but will burden other levels of government with additional cash costs. More importantly, it will reduce American capabilities of understanding and coping with the needs of our society in general and our cities in particular.

The Bureau of the Census has completed a long and costly process of consultation, testing, and evaluation of the content of the 1990 Census, taking the needs of all governmental levels into account. The City of Seattle was pleased to be able to participate in this responsible preparation for the decennial census, providing local staff support to what it considered beneficial intergovernmental communication and planning.

To hear informally, rather than officially, that this planning is about to be abandoned, with less than one day to get a written response into the record, is profoundly disturbing. I am afraid that this is a budget balancing effort guaranteed to exacerbate future budget problems at many levels of government, taken with inadequate consideration of real costs and benefits.

I am told by the National League of Cities that you are about to delete completely from the 1990 Census:

- mobility/migration (where persons lived five years before census)
- year moved into present residence
- birthrate (number of children born to woman)
- full time/part time employment (number of hours worked last week)
- commuting (mode of transportation and time required)
- unemployment (labor force status)

An equal employment opportunity - affirmative action employer.

1200 Municipal Building, Seattle, Washington 98104, (206) 625-4000

- unemployment previous year
- housing costs (rent, mobile home fees, mortgage payments, taxes, insurance, costs of utilities and fuels)
- home values
- number of bedrooms
- energy data (house heating fuel and equipment, water heating)
- availability and number of automobiles

It is hard to imagine Seattle, or other cities, coping constructively with the dynamic needs of our rapidly changing population without such information about the city as a whole and about distinctive parts of the city.

Sincerely,

Charles Royer

Charles Royer

cc: William P. Butz, Bureau of the Census, Washington, DC

HAC

HAROLD O. WILSON
Executive Director

Housing Assistance Council Inc. • 1025 Vermont Ave., N.W. • Suite 606 • Washington, D.C. 20005 • (202) 842-8600

August 6, 1987

Senator Paul S. Sarbanes, Chairman
Joint Economic Committee
Dirksen Senate Office Building
Room G01
Washington, D.C. 20510

Dear Senator Sarbanes:

In response to the Committee's invitation, the Housing Assistance Council is sending the attached information on the use of the Census housing characteristics data by major rural housing programs. HAC is a private nonprofit organization which provides technical assistance to rural communities seeking to develop low-income housing. We thus often act as a liaison between such communities and federal or state housing agencies, and are well aware of the program requirements of these agencies.

We are aware that the Office of Management and Budget is proposing to eliminate from the 100% sample of the 1990 Census many questions concerning housing characteristics, and that it is proposing to shift to the one-in-six sample most of the remaining housing questions. OMB's rationale is that the data are not used in program administration, or are available elsewhere.

Contrary to OMB's position, the attached program legislation and regulations show that the major housing programs administered by the Farmers Home Administration rely on data available from the 100% sample to equitably and uniformly allocate program funds. Attached are the formulas and priorities from FmHA's rental, homeownership, home repair, and home preservation programs which make use of Census information on small areas. Such information is not systematically available for individual rural communities from any source other than the Census.

Clearly, if the questions pertaining to number of rooms (which is needed to determine overcrowding) and lack of complete plumbing are shifted to the one-in-six sample, the reliability of such data at the small rural community level will be seriously undermined, so much so that FmHA may be unable to use these measures.

S.E. Office
Atlanta, GA

S.W. Office
Albuquerque, NM

Western Office
Mill Valley, CA

This is just one example of the importance to public program administration of uniform and reliable data on housing conditions at the local level. It should, however, serve to demonstrate that programs do use the Census data affected by OMB's proposal. In fact, rural programs can turn only to the Census data resource to demonstrate that they have met the requirements legislated in Section 532 (a) of the 1983 Housing and Urban/Rural Recovery Act,

Please let us know if you need more information.

Sincerely,

Harold O. Wilson

Harold O. Wilson M
Executive Director

Enclosures

Housing Statistics User Group

Fifteenth and M Streets, NW
Washington, D.C. 20005

Secretariat

Mary K. Nenno, Chairperson,
NAHRO, (202) 429-2960

Michael S. Carliner, Vice Chairperson,
NAHB, (202) 822-0376

Robert S. Villanueva, Secretary,
NAHB, (202) 822-0237

August 6, 1987

The Honorable Paul S. Sarbanes
Chairman
Joint Economic Committee
SD-G01 - Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Sarbanes:

Re: Hearing of August 7 on Proposed Cutbacks in Housing Questions in the 1990 Decennial Census.

The Housing Statistics Users Group (HSUG), representing professional staff members of 11 major national public and private organizations that utilize housing data, would like to commend you for calling a special hearing of the Joint Economic Committee to consider the OMB proposal to eliminate housing questions from the 1990 Decennial Census.

Individual members of the HSUG, as shown on the letterhead, will be personally testifying or filing statements for the hearing record in protest to these proposed deletions, and documenting the extensive use of the housing questions from the perspective of their particular areas of involvement in housing.

As Chairman of HSUG, I would like to raise a broader question of our concern -- e.g., the use of authority of the "Paper Work Reduction Act" by the OMB to make substantive, policy determinations as to the value of data in the decennial census. We recognize and support the reduction of excessive paper work, but we do not view this as justification to make the kind of eliminations in housing data proposed by the OMB -- 19 housing questions and three related population questions -- in a schedule which has already been reduced by seven housing questions over the 1980 Decennial Census.

Whether the OMB has the authority under the "Paper Work Reduction Act" to judge the value of data and make such wholesale deletions is a legal question to be decided by attorneys. But we believe the Congress could well review the intent of the Act, and the scope of authority it provides.

As long-time professionals in the housing field, we believe there is extensive utility for the proposed housing questions to be eliminated, by both public and private interests at national, state, and local levels.

Members From: AFL-CIO American Planning Association Council of State Housing Agencies Housing Assistance Council
Mortgage Bankers Association National Association of Housing and Redevelopment Officials National Association of Home Builders
National Association of Realtors National Council of Savings Institutions National League of Cities The Urban Institute

HSUG believes that the Congress should thoroughly explore the use of authority by OMB under the "Paper Work Reduction Act" to make these kinds of data deletions.

Sincerely yours,

Mary K. Nenno

Mary K. Nenno
Chairperson

NAHRO National Association of Housing and Redevelopment Officials
1320 Eighteenth Street, Northwest, Washington, D.C. 20036 (202) 333-2020

August 6, 1987

The Honorable Paul S. Sarbanes
Chairman
Joint Economic Committee
SD-G01 - Dirksen Senate
  Office Building
Washington, DC 20510

Dear Senator Sarbanes:

Re: Hearing of August 7 on proposed cuts in housing questions in the 1990 decennial census.

The National Association of Housing and Redevelopment Officials (NAHRO) would like to express its deep distress at the proposal of the Office of Management and Budget (OMB) on July 24 to drop roughly 30 questions from the 1988 Census Dress Rehearsal for the 1990 Census. Almost two-thirds of the proposed cuts are questions on housing. NAHRO is a 50-year-old association of local housing and community development agencies in over 2,300 local communities. The Association commends your action as Chairman of the Joint Economic Committee in calling a hearing to hear testimony on this proposal. We respectfully request that this letter be entered into the hearing record.

It is unbelievable that this critical information should be eliminated at the same time as the United States is in the midst of such revolutionary changes in the supply and cost of its housing, and dynamic shifts in its housing markets. It is further impossible to understand why these essential items, many accepted as part of the decennial census dating back to 1940, should now be dismissed as expendable. There is no solid evidence that the overwhelming majority of respondents considered these questions as an undue burden.

The action of July 24 is also hard to understand in light of the fact the Census Bureau had already taken action to delete seven housing items that had been enumerated in 1980 and will not be enumerated in 1990 (number of units at address, access to living quarters, number of stories, presence of elevator in structure, type of cooking fuel, presence of air conditioning, and number of bathrooms). Only one new housing question is proposed to be added -- congregate housing. Proposals to add additional questions on housing quality have already been eliminated by the OMB.

Melvin J. Adams, President, **Helen L. Sause**, Senior Vice President, **Howard T. Byrd**, Vice President—Commissioners, **Joseph E. Gray, Jr.**, Vice President—Community Revitalization and Development, **John Simon**, Vice President—Housing, **Joan Smith**, Vice President—Member Services, **Wayland R. Smith**, Vice President—Professional Development, **Robert W. Maffin**, Executive Director

In all, nineteen questions on housing are proposed to be eliminated from the 1990 Census, including such long-standing, critical items as home value, rent, fuel, heating equipment, cost of utilities, number of bedrooms, date moved in (migration), and real estate taxes. In addition, five questions are proposed for transfer to a sample from the 100 percent form: number of rooms, plumbing facilities, condominium, presence of telephone, and owner/renter. Transfer to a sample makes it impossible to assemble local data on a block-by-block basis and target housing improvement actions to areas most in need, and most in line with complementary community improvement efforts. This loss in housing questions would be further compounded by the proposal to drop three related questions from the population enumeration -- residence five years ago (migration), transportation to work, and time to work. A listing of these proposed changes is shown as Attachment A.

NAHRO as an association representing housing and community development agencies in over 2,300 local communities believes that the deletion of these housing items from the 1990 Census would cripple the capacity of both public and private housing interests -- at national, state, and local levels -- to assess housing needs, target housing improvement actions, carry forward federally-assisted as well as state and locally-assisted housing and community development efforts. These data are not available from any other source, and they are the backbone for evaluating the status of the nation's housing.

HUD's Assistance Programs: The U.S. Department of Housing and Urban Development is charged by statute with carrying out a variety of functions that require the housing data proposed for elimination. These functions include allocating program funds and determining entitlements for its assistance programs. These HUD programs -- Community Development Block Grants (CDBG), Section 8 Rental Housing Assistance, and Rental Rehabilitation Grants -- have statutory formulae using the census data at the community level for allocating program funds. Two additional HUD programs -- Urban Development Action Grants (UDAG) and Housing Development Grants (HoDAG) -- have statutory formulae using these housing census items to establish entitlement to compete for assistance funds. Once entitlement is established for UDAG and HoDAG, local communities must support their competitive application with housing need data, much of it drawn from the decennial census.

In addition to the allocation of its assistance funds, the Department of HUD uses housing census data for other functions, including setting standards for program participation, analyzing markets for application reviews, evaluating existing programs, investigating fair housing complaints, analyzing housing conditions to identify unmet needs for policy purposes, and providing baseline data for current surveys.

A full description of the "HUD Need and Uses of Decennial Census Data," as submitted by HUD to the Bureau of the Census, and included in the Census Bureau's submissions to Congress on 1990 Census Planning, is shown as Attachment B.

State and Local Programs: In addition to documenting need, eligibility, and application support for HUD's assistance programs (as described above), states and localities depend on housing data from the decennial census to program and target their own housing and community development efforts. The decennial housing data is also the benchmark from which they develop special surveys to expand and update information over the ten-year period between decennial censuses.

Over the last several years, there has been a significant increase in state and local housing initiatives, often combined with economic and community development efforts, requiring more refined "strategies" interrelating all of these efforts. This requires more refined data analysis, much of it drawn from decennial housing data.

The extensive use of housing census data for local planning purposes was extensively documented by NAHRO and The American Planning Association (APA) for the Government Accounting Office (GAO) in 1986 and is included in the GAO report, Decennial Census: Local Government Uses of Housing Data (GAO/GGD-87-J6 BR, April, 1987). This was further supported by APA testimony before the Senate Governmental Affairs Committee and the House Post Office and Civil Service Committee (John C. McClain, AICP, May 14, 1987).

In summary, NAHRO strongly advocates quick action by the Joint Economic Committee and others to reverse this ill-conceived proposal to drastically curtail housing items in the 1990 Census.

Sincerely yours,

Richard Y. Nelson, Jr.
Executive Director

Attachments

City of Palm Springs

Office of the Mayor
619-323-8200

August 6, 1987

Donald Arbuckle
Office of Management & Budget
New Executive Office Building
726 Jacson Place, N.W.
Washington D.C. 20503

Dear Mr. Arbuckle,

It has come to my attention that the Office of Management and Budget has directed the U.S. Census Bureau to delete nearly half of the proposed questions from the upcoming "dress rehearsal" census forms for the 1990 Census. This action would deprive the City of Palm Springs of our source of essential statistical data about our community.

Currently, our most recent data is from the 1980 Census. If the 1990 Census does not provide us with this data, we will be without it until the year 2000. Statistical data is essential for the planning of our housing, transportation and social service programs. Without an accurate picture of our population and their needs we, as a local government, cannot be responsive .

The data is essential for our use and is equally important to the private sector. We receive inquiries on a weekly basis for information on the demographics of the City of Palm Springs. Potential investors, local, nationwide and international, need an accurate, up to date picture of the community in which they are considering investing. We have consolidated the data from the 1980 Census, published it, and make it available to the private sector. We certainly intend to do that with the 1990 Census data.

As Mayor of Palm Springs, I believe it is important that the directive to delete questions from the Census be reversed. Our abilities to plan for future growth, transportation needs and social services will be severely hindered if it is not. Thank you for your attention to this very important issue.

Sincerely,

Frank Bogert,
Mayor, City of Palm Springs.

FB/hd

cc: William Butts
National League of Cities

Post Office Box 1786, Palm Springs, California 92263-1786

APA
American Planning Association
1776 Massachusetts Ave. NW
Washington, DC 20036
Phone 202 872 0611

STATEMENT OF
THE AMERICAN PLANNING ASSOCIATION

FOR A HEARING OF THE
JOINT ECONOMIC COMMITTEE

ON THE
PROPOSAL OF THE OFFICE OF MANAGEMENT AND BUDGET
TO DELETE ITEMS FROM THE
1990 CENSUS

AUGUST 7, 1987

Mr. Chairman and distinguished members of the Joint Economic Committee:

This statement is being offered on behalf of the American Planning Association. We respectfully request that it be included in the official hearing record.

The American Planning Association is a national organization of 21,000 members, including public and private planners and elected and appointed officials at all levels of government as well as educators, students and interested citizens. Our members belong to 45 chapters covering every state and Congressional district. Many of our members use Census data on a daily basis.

APA was formed in 1978 when the American Institute of Planners, founded in 1917, and the American Society of Planning Officials, founded in 1934, consolidated. The Association's primary objective is to advance the art and science of planning for the improved development of the nation and its communities, states and regions. Within APA is the American Institute of Certified Planners which focuses on professional development. Members of AICP are distinguished by having met experience requirements and by having passed an examination on planning principles and practices.

APA is strongly opposed to the elimination of key population and housing data from the U.S. Census Bureau's 1988 dress rehearsal. We believe the proposal by the Office of Management and Budget (OMB) is shortsighted and fails to recognize the importance of Decennial Census data in decisionmaking in both the public and private sectors. Our statement will focus on the policy and decisionmaking impacts of OMB's proposal.

In seeking to justify their actions, OMB suggested the deleted data did not serve important purposes or were not needed uniformly across the nation. In reality, the deleted data are essential to measure progress and develop new alternatives in many important policy areas.

OMB's decision has drawn widespread criticism from elected officials, academic institutions, community organizations and private industry. The Decennial Census is not an isolated statistical exercise; it is an ongoing policymaking tool. Census data impacts policies and programs in such diverse areas as housing, education, energy, transportation, child care, health care, and employment.

APA is particularly concerned about the impact of the proposed elimination of questions pertaining to housing. Approximately two-thirds of the 30 questions considered by OMB for elimination are directly linked to housing. The loss of these data would jeopardize the ability of both the public and private sectors to meet the still unmet challenge of a "decent home and a suitable living environment" mandated by the Housing Act of 1949.

If the OMB proposal is implemented, decisionmakers at every level will lose their most valuable tool: information.

The following four points illustrate how decisionmaking in housing programs would be affected:

(1) The Section 8 Existing Housing Certificate program represents a major housing initiative that enables lower income households to obtain affordable and decent housing. A key element of this program is the periodic publication by the U.S. Department of Housing and Urban Development (HUD) of fair market rents for communities throughout the nation. The rental data proposed for elimination would hamper the ability of HUD and local housing agencies to update this information, upon which millions of dollars in housing assistance depend.

(2) The housing affordability crisis affects many communities throughout the nation, both large and small. Federal funding for housing and community development programs has been cut by more than 70 percent since 1981 prompting many state and local governments to respond with a variety of local housing initiatives. These new initiatives, however, are jeopardized by the loss of important population, housing condition and utilization data, which are used to develop programs and monitor performance. If communities are expected to target scarce local resources, they need the comprehensive data produced by the Decennial Census.

(3) Some of the information proposed for deletion would impact on the ability to administer current Federal programs, such as the Community Development Block Grant (CDBG) program. Data on overcrowding and the condition of the housing stock would be lost under the OMB proposal, which are important measures required by HUD for CDBG allocation.

(4) New Federal legislation creating programs to aid the homeless will require each jurisdiction to adopt a Comprehensive Homeless Assistance Plan. How can local governments adequately plan to meet the housing needs of our nation's homeless if we are denied accurate data on our housing stock?

The data that the OMB is proposing to eliminate is also used for a variety of public policy decisionmaking for programs other than housing and community development:

- Local governments rely on data on the source of water, public sewers and plumbing facilities to plan for adequate water supplies and wastewater treatment facilities. Private utility companies also depend on utility, fuel and other housing data to make decisions on new plant construction and utility rates, involving investments of millions of dollars. This nation cannot afford to be unprepared in the event of another energy crisis, due to a lack of data.

- State and local governments rely heavily on journey-to-work data for transportation planning. Key decisions on land development and traffic impact are made using this data which few, if any, local governments would be able to collect on their own. Multi-million dollar public highway and mass transit projects, along with private investment, hinge on the transportation data proposed for elimination.

- Funds allocated under the Job Training Partnership Act are largely based on labor force data also proposed for elimination. The effectiveness of local programs to train and employ unemployed workers would be jeopardized under the OMB plan.

In offering this proposal, the OMB suggested that data may not be needed at a national level, or that data may be more appropriately collected by a smaller sample, or in a more specific geographic area. APA views this approach as unwise and inefficient. Although the solutions to our nation's and communities' problems may require different approaches, the basic information needed to make those evaluations is the same. Local communities, particularly rural areas, may not have adequate resources to collect and analyze locally collected data. It is simply not cost effective to require thousands of communities to collect individually the same data collected by the Decennial Census on a national level.

Not only is OMB's decision ill-founded, but their process in reaching this decision has been unfair. OMB has chaired the Federal Agency Council for the 1990 Census since 1984 and has been involved in the preparation and review of proposed questions since that date. During all these months of deliberation between OMB, the Bureau of the Census, Federal agencies and data users, OMB failed to express any concern about the application of the Paperwork Reduction Act. Only on July 24, 1987, just before the Congressional recess, and with only two months for public comment, did OMB indicate its intention to eliminate key housing and other demographic data, citing their responsibility under the Paperwork Reduction Act. Although time remaining before the 1990 Census is growing short, it is imperative that the views of local communities, data users, and others concerned with the Census be heard before an irreversible decision is made.

Rather than attempt to alter the 1988 dress rehearsal at this late date, OMB should rely on the judgment of Census officials and staff. The l988 dress rehearsal is the product of some of the most noted demographic and statistical experts in the nation, and reflects the input of data users in both the public and private sectors. OMB should respect the professional expertise that developed the 1988 Census dress rehearsal.

APA does not view the Decennial Census as just another government program. The Census was one of the first acts of our newly formed republic in 1790 and has enjoyed the support of the American people for almost 200 years. The American people respect the Census and comply because they understand the value of information in a democratic society. Census data enable government, industry, and private citizens to better understand our past, view our present, and to plan for our future. The time that it takes for respondents to complete the Census questionnaire is a wise investment that will enable the nation to plan for our needs as we approach the 21st century.

Senator Sarbanes, the American Planning Association is most appreciative of your conscientious inquiry into this important subject and your Committee and its staff are to be commended for holding this hearing on such short notice prior to the Congressional recess.

We hope that Congress and the Joint Economic Committee will do all within their power to see that the proposal by OMB to eliminate so many necessary items from the 1990 Census is not implemented.

Thank you for the opportunity to express the views of the American Planning Association on this subject. We would be delighted to assist the Committee to see that the Census is restored to being a compilation of data that is truly useful for public and private decisionmaking.

AMERICAN ASSOCIATION OF STATE HIGHWAY
AND TRANSPORTATION OFFICIALS

JOHN R. TABB, President
Director
Mississippi State
Highway Department

FRANCIS B. FRANCOIS
Executive Director

August 7, 1987

The Honorable Paul S. Sarbanes, Chairman
Joint Economic Committee
SD-G01
Washington, D. C. 20510

Dear Paul:

The American Association of State Highway and Transportation Officials is comprised of the state highway and transportation agencies in the 50 states plus the District of Columbia and Puerto Rico. We at AASHTO are greatly alarmed at recent proposals of the Office of Management and Budget to eliminate key transportation questions from the U.S. Census.

The most recent use of this information is the enclosed study "Commuting in America" prepared under a cooperative effort of the several public interest organizations identified in the report. This report would have been impossible without the decennial census data compiled by the Bureau of the Census.

The data is routinely used by the States as the only reliable information on commuting patterns. No alternative exists for the collection of this data unless the States collect it individually which would increase public costs and reporting burdens and reduce data quality and comparability.

We hope you will take whatever action is necessary to maintain the collection of this vital information which has proved highly beneficial to the State transportation agencies.

Very truly yours,

Francis B. Francois
Executive Director

FBF:WDL

EXECUTIVE OFFICE: 444 N. Capitol Street, N.W., Suite 225 Washington D.C. 20001 Telephone (202) 624-5800

CACI 25 Years
Information Systems • Advanced Technologies • Market Analysis

August 7, 1987

Senator Paul S. Sarbanes, Chairman,
Joint Economic Committee
Dirkson Senate Office Building
Washington, DC 20510

Dear Senator Sarbanes:

As an executive representing one of the six major demographic firms in the United States, I am writing on behalf of CACI to express our deep concern and strong opposition to the Office of Managment and Budget proposal to significantly cut the content of the 1990 Census Questionnaires.

CACI, together with our counterparts in this industry, serve a combined clientele numbering in the hundreds of thousands that represent a broad cross-section of commercial establishments, government agencies and not-for-profit corporations. All of these organizations depend on Census-based information products and services to make informed decisions about where to allocate resources to better serve their customers or constituents.

While private information companies can and will make many valuable contributions to our knowledge of consumer activities and preferences, the 1990 Census must serve as the centerpiece of consumer information over the coming decade. The OMB-proposed cuts in the content of the 1990 Census seriously undermine the ability of the demographic-based sector of the information industry to meet the future demands of these public and private enterprises. The absence of a complete Census will undercut the private sector's efforts to become more competitive in U.S. markets and more productive in the use of their capital. The savings claimed by OMB from a shortened Census questionnaire pale by comparison to the inevitable costs and hardship incurred through the misallocation of resources intended to better serve consumers and taxpayers.

Hundreds of thousands of American businesses depend on Census information to help them make their everyday decisions on production, distribution, marketing, advertising, retailing and site location. ALL of the items which OMB has proposed to cut are essential to those decisions. The migration question, for instance, may appear to esoteric until one considers the broad implications for differences in the goods and services needed for a population consisting of new movers compared to those long-term residents in established neighborhoods. Housing Census items such as market value, rent and quality provide considerable insight

FAIRFAX OFFICES
CACI, INC.-FEDERAL: 8260 WILLOW OAKS CORPORATE DRIVE, FAIRFAX, VIRGINIA 22031 • (703) 876-2000
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into how a business might assess a consumer's needs and abilty to pay. The needs and desires of people who, for example, live in an expensive, single family dwelling neighborhood are different from those in exclusive townhouses, and different altogether from renters.

Each subsequent decennial Census has made significant contributions to private enterprise and the consumers they serve. It would be a tragic mistake to curtail the scope of the 1990 Census and eliminate the only possible source of comprehensive information on topics vital to many thousands of organizations in both the public and private sector who can better serve the taxpayer and consumer in the next decade. We urge you to overrule the OMB proposal to eliminate these vital questions and restore the questionnaire to its original format.

Sincerely,

Daniel F. Huck
Vice President and Director
Market Analysis
CACI, International Inc.

cc: Mr. Paul Manchester
Staff Economist
Joint Economic Committee
Dirkson Senate Office Building
Washington, DC 20510

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Los Angeles Area
Chamber of Commerce
404 South Bixel Street
P.O. Box 3696, Terminal Annex
Los Angeles, California 90051-1696
(213) 629-0711

RECEIVED AUG 1 1 1987

August 7, 1987

Wendy Gramm, Ph.D.
Administrator, Office of Information & Regulatory Affairs
U.S. Office of Management and Budget
1726 Jackson Place
Washington, D.C. 20503

Dear Ms. Gramm:

On behalf of the Los Angeles business community, I would like to express concern and opposition to the proposed elimination of questions on both population and housing from the 1988 Census Dress Rehearsal questionnaire and the 1990 Census of Population.

The Los Angeles five-county area has experienced very rapid growth since 1980, and we know that the character and needs of our population have also changed. Information on demographics, housing, and transportation are crucial in enabling us to accurately assess our area's job and transportation needs into the 1990s.

We appreciate OMB's desire to reduce paperwork, but we feel that the Census data is vital. We urge that you reconsider the proposed deletions. If you have any questions about our usage of the Census data, our chief economist or program directors in housing and transportation would be happy to discuss them.

Sincerely,

Ray Remy

Ray Remy
President

CC: William P. Butz, Bureau of the Census
Chairman Mervyn M. Dymally, Subcommittee on Census &'Population
Linda Gage, California Department of Finance, Population Research
Alan Beals, National League of Cities
Dick Hartman, National Association of Regional Councils

American Demographics
Inc.

108 N. CAYUGA ST. ITHACA, NY 14850
P.O. BOX 68 ITHACA, NY 14851
607/273-6343

AMERICAN DEMOGRAPHICS
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INSTITUTE

THE NUMBERS NEWS

CONSUMER MARKETS ABROAD

August 10, 1987

Senator Paul Sarbanes
Chairman, Joint Economic Committee
332 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Sarbanes:

The plans by the Office of Management and Budget to remove questions from the 1988 Census dress rehearsal questionnaire have recently come to my attention. The removal of these questions questionnaire means that they will not appear in the 1990 census. I would like to go on record as opposing this plan.

The Census Bureau has put a great effort into designing the 1990 census questionnaire. They have been seeking public comment through meetings, advisory group discussions, consultations with other federal agencies, speeches before professional associations, etc., since the 1980 census was completed.

The data available through the census is not data business can get for itself. This is data that only the government, with its pledge of confidentiality and its universality of coverage, can gather. With no migration question there will be no way of knowing which kinds of places (cities, suburbs, newburbs) are growing or declining, and with which kinds of people. Today, migration accounts for most of our population shifts. How can government or business prepare for the future without such data?

By deleting the question on housing value, we will no longer have small-area information on the most important asset Americans own--their houses. Home equity accounts for 41 percent of Americans' net worth--our largest single asset.

The questions on labor force status and hours worked are crucial for measuring change by occupation and industry as well as by demographic traits and geographic location. With this information, we can design education programs, consumer products, and distribution and retail mechanisms that will increase well-being, not stunt it or even set it back.

This is the information age. The census is the best--and for many activities our only--source of information. Without adequate knowledge of customers, companies can't compete effectively, and without knowledge of their constituents' needs, local goverments can't govern efficiently.

I urge you to insist that the 1988 dress rehearsal questionnaire be allowed to remain as proposed by the Census Bureau. I thank you for your consideration in this matter.

Sincerely,

Peter Francese
President

apdu
association of public data users
princeton university computing center
87 prospect avenue
princeton, new jersey 08544
(609) 452-6025/6052

August 10, 1987

Dr. Wendy Gramm, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
727 Jackson Place NW
Washington, DC 20503

Dear Dr. Gramm:

This letter is in regard to the Office of Management and Budget's decision to drop approximately thirty questions from the 1988 Census Dress Rehearsal questionnaire and, by implication, the 1990 census questionnaire.

I am President of the Association of Public Data Users, which represents 150 public, private and academic organizations who are users, producers and distributors of public data. We oppose this eleventh-hour decision to eliminate important items yielding data vital to public policy planning. A thorough process, including more than 65 public meetings throughout the country, led to the development of this questionnaire. This arbitrary action by OMB degrades the invaluable public, private and academic thinking, analysis and hard work invested in the development of the questionnaire content.

The Association understands the importance of reducing "the burden on the public" in completing government forms. Because the decennial census is mandated by law to obtain a response from each resident of the nation, the questionnaire should receive the greatest amount of scrutiny. We feel, nonetheless, that dropping these items from the 1988 Dress Rehearsal questionnaire ignores the comprehensive and thorough review process conducted to date by the Bureau of the Census.

Our Association is dismayed at the timing of OMB's action and is unconvinced that OMB's stated reasons haven't already been addressed in the formal hearings, special conferences, and special counsel sought by the Bureau of the Census.

We therefore wish to pose the following questions to the Office of Management and Budget and await your response:

- Why did OMB wait until after the 1988 Census Dress Rehearsal questionnaire was drafted to introduce a set of criteria affecting questionnaire content? The timing is very peculiar since OMB chaired the Federal Agency Council on the 1990 census and thus enjoyed early planning access and involvement in the development of this questionnaire.
- Is OMB aware of, and has OMB reviewed, public documentation by the Bureau of Census that supports the proposed questionnaire content?
- What is OMB's plan to otherwise assimilate, analyze, and disseminate the data represented by the deleted items so that this valuable information is still available to our constituent members for public planning use?

I strongly urge the Office of Management and Budget to rescind its decision to drop approximately thirty questions from the 1988 Census Dress Rehearsal questionnaire and to accept it as submitted by the Bureau of the Census to the Honorable Mervyn M. Dymally.

Sincerely yours,

Kenneth Riopelle

Kenneth R. Riopelle, Ph.D.
President
Association of Public Data Users

cc: Hon. Mervyn M. Dymally, U.S. Representative
Hon. Paul Sarbanes, U.S. Senate
John J. Keane, Bureau of Census
William Butz, Bureau of Census
Katherine Wallman, Council of Professional Associations on Federal Statistics

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10 August 1987

Joint Economic Committee
Attn. Paul Manchester
332 Dirkson Senate Office Bldg.
Washington, D.C. 20510

Dear Mr. Manchester:

It has come to my attention that the Office of Management and Budget (OMB) has "suggested that certain questions be dropped" from the 1990 Decennial Census questionnaire.

First, the Bureau of Census has held extensive public hearing and seminars soliciting information about the 1990 Census and the questions which should and should not be asked. They have volumes of information at their disposal. They are the statisticians of the federal government with a great deal of expertise. To my recollection, I have not hear of any public meetings or seminars being held by the OMB as to questions for the 1990 Census. Just who does OMB think they are and based on what expertise does OMB question Census on its carefully constructed questionnaire? Particularly at this late date and with little or no public input. Census knows its users and should not be asked to unduely justify questions so important to the nation.

Second, let me provide you with examples of usages by the local level, "nitty-gritty" users of the Census information.

1.) a local bank used the "residence five years ago " to plan its new branch.

2) The MACOG (Michiana Area Council of Governments) uses the utility information in planning for another oil imbargo by identifying areas which would be hardest hit if oil prices escalated. Again, migration information and "mode and travel time to work" is used in charting the growth of the area and planning transportation needs, roads, etc. "Rent and value" is used in tax planning.

3) Small business uses the statistics in placing new small businesses and assessing expansion of existing business concerns.

4) Our MBA students use this information in planning their marketing stratigies for classroom assignments. This same methodology is then continued by them on the job with large and small firms.

Third, let me address the OMB reasons for deleting the questions.

1) "A scarcity of documented evidence-- such as for policy planning purposed, program enactment or other broadly based public need -- that the resulting data would serve important purposes." As stated above the Census Bureau has held

extensive hearings and meetings, for which there are transcripts and reports. I, as a participant, have received such transcripts. OMB need only to ask for these. I have also indicated above that the local governmental unit MACOG as well as other city offices (ie. police, transportation,) and small business concerns, all use these statistics. OMB has obviously not check with any of the local planning groups or local government before putting forth this argument.

2)"Data resulting from some of the items are not necessary at highly localized geographic levels." The Michiana Area Council of Government is not interested in state level information, neither is the City of South Bend's transportation department. They are interested only in highly localized geographic levels of information directly within their administrative view. The small local business is not establishing a nation-wide local business and needs only highly localized geographic level information, usually within the city and county. Again, OMB has not checked with the Small Business Administration concerning what information needs the local small business has and what statistical agency or survey answers those questions.

3) "Some data items are not required uniformly across the nation." Again I differ with the OMB. Most transportation agencies of local government, county or regions will be using the information provided by the Census. True, it may not be uniformly required, but local units through the Census Bureau's State Data Center Program manipulates the given data into useful reports.

4) "Some are available from alternative sources." In some cases true, but not uniform or reliable source. The difficulties of entering, validating,and merging information from various sources make the resulting statistics less then reliable. The OMB continues to put this reason forward. The Census Bureau has been collection information for over 100 years. Their methodology and validity is well known and used by the users of statistics. Alternative sources would introduce undue costs and statistical error to any endeavor.

5) "Some of the questions would yield data that would not be sufficiently reliable." The questions identified by OMB contain less statistical error and are more reliable then others left in the questionnaire. The Census Bureau has been improving the reliability of its statistics and has discussed this issue at its public meetings. The statistical community is well aware of the faults of the statistics but has adapted and is quite capable of using the statistics. The absence of any information is not as desirable as having data with a known statistical error associated with it.

Finally, OMB has waged, in my opinion, a systematic war on the statistical evidence of our nation. In presuming to question the 1990 Census, it is obvious that the OMB does not know about the uses of the statistics the Census provides and that their are unaware of the Census Bureaus continuing program of evaluation. If the OMB had familiarized themselves with the Census Bureau and its programs and the information available to it (OMB), the "suggested" deletions would not have be made.

I am asking that you communicate to OMB 1) that your constituents

DO use this information at the "Highly localized area" and that 2) the OMB should check their facts before assuming that their (OMB) knowledge about the statistical user community and needs of the citizens is better then a much larger, high specialized agency who is constantly reviewing its programs such as the Bureau of the Census.

My time is valuable. The constant battle between OMB and the statistics-users community is time consuming and wasteful. The Paperwork Reductions Act, used so frequently as a reason for OMB action, has done little to reduce the amount of time and paper I must expend fighting OMB action on statistical and other issues.

I thank you for your attention to this important matter. I will be happy to discuss this with anyone from your office if you would like.

Respectfully,

Stephen M. Hayes

Stephen M. Hayes
Reference and Public Documents Librarian
(219) 239-5268

CC: -all Indiana Senators and Representatives.
-D. Arbuckle, Office of Management and Budget.
-Joint Economic Committee Chair and Vice-Chair and
P. Manchester, staff.
-B. Butz, Assoc. Dir, Census Bureau

The Brookings Institution

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Social Science Computation Center

August 13, 1987

Senator Paul Sarbanes
United States Senate
Washington, D.C. 20515

Dear Senator Sarbanes:

On Friday, August 7, 1987, I brought to the office of the Joint Economic Committee letter, a copy of which I am including with this one. This letter was intended for the hearing you held that Friday morning apropos of the proposed changes to the 1990 Census. As we were too late for the hearing, I asked your Press Secretary to have the letter included in the record of the hearings, and I then promised to send you some information on the signers of the letter, most of whom are staff members of The Brookings Institution.

We are not permitted, by our by-laws, to be advocates in the name of Brookings for any causes, but we can, of course, make statements and appeals on the basis of our individual accomplishments and experience, and in this case we felt strongly impelled to do so.

I have checked the names from our directory of those persons signing the "Census letter." The response was very encouraging and would have been still greater had there been more time and had it been other than the summer vacation time.

Yours very truly,

Christine C. de Fontenay

Christine C. de Fontenay
Manager of Research Programming

CdeF:nh
Enclosure

Copy to: Cong. Dymally; Wendy Gramm, OMB; Joint Economic Committee

August 6, 1987

We, the undersigned, scholars and users of the Census, wish to register our strong objection to the changes in the content of the 1990 Decennial Census of Population and Housing proposed by the Office of Management and Budget.

Our objection is two-fold: we disagree profoundly with the substance of the changes as will be described later in this letter. But we also take equal umbrage with the manner in which these changes are being proposed. Why were these proposals not made long enough ago that they might be discussed at those public meetings whose very purpose it is to examine such matters? Why has so little time been allowed for public response? Why was the summer vacation-time chosen as the period in which to make a brief announcement of what amounts to a major public policy change? If these changes to the Census are in fact worthy ones, then they should be able to bear reasonable, thorough public scrutiny.

As for the substance of the proposed changes, we object in general to dropping questions except those which have become historically irrelevant because questions asked on previous Censuses are an important part of the historical record of the United States. Yet we understand that it is being proposed to drop almost half of the questions. Is it possible that nearly half of the questions on the Census have become obsolete within a ten-year period?

There is far more at stake than the quantity of the information which the Census reveals. It is the quality of the data which would be compromised by dropping many of the questions. The Census alone provides adequate benchmarks for defining the samples of other surveys. Only the Census includes information on as many people as it does. Only the Census combines so much demographic and economic data on such a scale. As an example, consider the labor force questions from the Current Population Survey - the answers to which determine our national employment data. This vital data would be far more biased if the labor force participation questions were dropped from the Census. The real value of questions asked on the Census is that unlike other sources of data, Census provides numbers which can be associated with a wealth of demographic and other material. Losing this connectedness would be a national tragedy.

21

The principles that are at stake here are: that of responsible governance whereby major public policy changes ought not to be made until they have been publicly and most carefully considered; and that of maintaining the worth of our most important national survey which is done by assuring its quality, its consistency, and its completeness.

Christine A.
Steven S. Smith
Clifford Winston
Kenneth S. Flamm
Edward J. Lincoln
Charles L. Schultze
Richard Goode
Gilbert Y. Steiner
Robert A. Katzmann
Henry J. Aaron
Martin N. Baily
Edward M. Bernstein

Rose M. Rubin
Ralph C. Bryant
Weir M. Brown
Gary T. Burtless
John S. Earle
Alfred
Barry Bosworth
Stephen Hess
Bruce MacLaury
Paul E. Peterson

HAC

HAROLD O. WILSON
Executive Director

Housing Assistance Council Inc. • 1025 Vermont Ave., N.W. • Suite 606 • Washington, D.C. 20005 • (202) 842-8600

August 13, 1987

Senator Paul S. Sarbanes, Chairman
Joint Economic Committee
Dirksen Senate Office Building
Room G01
Washington, D.C. 20510

Dear Senator Sarbanes:

Enclosed for the record is our testimony on the OMB proposal to reduce the 1990 Census reporting on housing characteristics. The Housing Assistance Council appreciates the Committee's invitation to provide information on the impact of this proposal on rural housing programs. Please let us know if we may be of further assistance.

Sincerely,

Harold O. Wil

Harold O. Wilson
Executive Director

cc: Enclosures

S.E. Office
Atlanta, GA
(404) 892-4824

S.W. Office
Albuquerque, NM
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Western Office
Mill Valley, CA
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RURAL PROGRAM USE OF CENSUS HOUSING INFORMATION

TESTIMONY
OF THE
HOUSING ASSISTANCE COUNCIL
TO THE
U.S. SENATE
JOINT ECONOMIC COMMITTEE

HAROLD O. WILSON
EXECUTIVE DIRECTOR

AUGUST 13, 1987

RURAL PROGRAM USE OF
CENSUS HOUSING INFORMATION

The Housing Assistance Council is grateful for the opportunity to comment on the proposal of the Office of Management and Budget to reduce 1990 Census reporting on housing characteristics. HAC is a private nonprofit organization which provides technical assistance to rural communities seeking to develop low-income housing. Our perspective is rural, and brings into relief some of the lesser known but particularly severe implications of OMB's proposal.

We are aware that the Office of Management and Budget is proposing to eliminate from the 100% sample of the 1990 Census many questions concerning housing characteristics, and that it is proposing to shift to the one-in-six sample most of the remaining housing questions. OMB's rationale is that the data are not used in program administration, or are available elsewhere.

Contrary to OMB's position, the attached program legislation (S. 532) and regulations show that the major housing programs administered by the Farmers Home Administration must rely on data available from the 100% sample to allocate program funds equitably and uniformly. Attached are the formulas and priorities from FmHA's rental (S.515), homeownership (S.502), home repair (S.504), and home preservation (S.533) programs which make use of Census information on small areas. Such information is not systematically available for individual rural communities from any source other than the Census.

FmHA is required by statute (Housing and Urban/Rural Recovery Act of 1983) to give priority to low-income households in inadequate housing, and it must somehow have a rational means of doing so. If it had no valid and reliable measure of rural housing need to guide the use of its funds throughout its state, district, and county office network, FmHA would not be able to administer its resources equitably or consistently. The alternative to operating according to a formula which incorporates such a measure is to select applicants on a case-by-case basis, presumably according to data and standards developed by the applicants themselves.

Each of the attached sets of program regulations uses "substandard housing" as a criterion for allocation of funds or to establish priority for funding, at the state and local levels. (The other formula factors are population size, incomes, and, for the home repair grant program, age.) FmHA, like most other housing programs, defines a "substandard" unit as one which is "lacking complete plumbing for exclusive use" or is overcrowded, with "1.01 or more persons per room." Both the plumbing and the overcrowding measures are based on Census information.

Not only do FmHA offices need information on substandard conditions at the local level for targeting resources, FmHA program applicants need such information to win priority for funding. All the programs listed above give priorities to applicants in substandard housing and organizations in communities with high substandard housing. The multifamily program, in fact, ranks applications according to a scale with 18 percentile breakdowns for the local incidence of substandard housing, from 0% to 34%. Similarly, many rural community development block grant programs include substandard housing in their housing needs assessments and applications. HUD's Section 202 program for the elderly requires that applications be evaluated for "special needs", including lower-income housing needs described in housing assistance plans, and in rural areas these have traditionally used substandard housing data from the Census.

What will happen to the ability to plan and assess housing efforts if the plumbing characteristics are entirely relegated to a sample? In 1990, the sample size is one in six for areas above 1,000 population. A census tract generally has a population of 4,000 to 5,000, and perhaps 1,500 occupied units. Of these, 250 would be in the sample, and in a rural area with 10% of its units lacking plumbing, 25 such cases might be reported, hardly enough to permit categorical breakdowns with any confidence. Again, a rural town with almost 2,500 residents and probably 800 occupied housing units would have 133 of its units in the sample. If 10% of these lack plumbing, 13 units will be so reported. Equally small numbers are produced by samples of 1 in 2 in communities of under 1,000 people. In such a community, with at most perhaps 300 occupied houses, half or 150 would be sampled. If a tenth or 15 of these lack complete plumbing, the margin for error is obviously high, and may be prohibitive for categorical breakdowns - such as those for owners and renters and racial groups.

Clearly, if the questions pertaining to overcrowding and plumbing are shifted to the one-in-six sample, the reliability of such data at the small rural community level will be seriously undermined, so much so that FmHA may be unable to use these measures.

Another example: If sample data had been used in the 1980 Census, recent research conducted by the Housing Assistance Council under contract with HUD would have been severely hampered. HAC provided HUD with background information on housing quality in the jurisdictions covered by the Small PHA/Rural Voucher Demonstration, and reported on the extent to which rental units in these areas lacked plumbing, for both occupied and unoccupied units. Note that it is possible, with the 100% count, to get figures for units which are for rent, but which lack plumbing. This figure has a significant effect on the effective vacancy rate for purposes of assessing the housing resources available for voucher holders. Its effect increases for just those areas inhabited by the large families and minorities given priorities in the voucher demonstration. For example, one southern county in 1980 had 455 units for rent, but only 336 of these had complete plumbing. In contrast with the resource, there were 841 poverty-level households in substandard units, three-fourths of which were black. It was important to know the disparity between resource and housing need, in order to provide a realistic assessment of how well vouchers worked or might be expected to work in these areas.

These are just a few examples of the importance to rural program administration of uniform and reliable data on housing conditions at the local level. They should, however, serve to demonstrate that programs do use the Census data affected by OMB's proposal.

In fact, rural programs can turn only to the Census data resource to demonstrate that they have met the requirements legislated in Section 532 (a) of the 1983 Housing and Urban/Rural Recovery Act.

HAC thus urges the Committee to ensure that the Census will maintain at their previous levels (shown in the form for the 1988 Dress Rehearsal) all the housing characteristics information items, including those which OMB has proposed for elimination or shifting to a smaller sample.

12 USC 1709.

ance of any mortgage meeting the requirements of section 203 of the National Housing Act.".

PROCESSING OF APPLICATION

SEC. 521. Title V of the Housing Act of 1949 is amended by adding at the end thereof the following new section:

"PROCESSING OF APPLICATIONS

42 USC 1490l.

"SEC. 532. (a) The Secretary shall, in making assistance available under this title, give a priority to applications submitted by—

"(1) persons and families that have the greatest housing assistance needs because of their low income and their residing in inadequate dwellings;

"(2) applicants applying for assistance for projects that will serve such persons and families; and

"(3) applicants residing in areas which are the most rural in character.

42 USC 1483.
42 USC 1490a.

"(b) In making available the assistance authorized by section 513 and section 521(a) with respect to projects involving insured and guaranteed loans and interest credits and rental assistance payments, the Secretary shall process and approve requests for such assistance in a manner that provides for a preliminary reservation of assistance at the time of initial approval of the project.".

RURAL HOUSING PRESERVATION GRANT PROGRAM

SEC. 522. Title V of the Housing Act of 1949 is amended by adding at the end thereof the following:

"HOUSING PRESERVATION GRANTS

42 USC 1490m.

"SEC. 533. (a) The purpose of this section is to authorize the Secretary to make grants to eligible grantees including private nonprofit organizations, Indian tribes, general units of local government, counties, States, and consortia of other eligible grantees, in order to—

"(1) rehabilitate single family housing in rural areas which is owned by low- and very low-income persons and families, and

"(2) rehabilitate rental properties or cooperative housing which has a membership resale structure that enables the cooperative to maintain affordability for persons of low income in rural areas serving low- and very low-income occupants.

Ante, p. 1181.

The Secretary may also provide assistance payments as provided by section 8(o) of the United States Housing Act of 1937 upon the request of grantees in order to minimize the displacement of very low-income tenants residing in units rehabilitated with assistance under this section.

"(b) Rehabilitation programs assisted under this section shall—

"(1) be used to provide loans or grants to owners of single family housing in order to cover the cost of repairs and improvements;

"(2) be used to provide interest reduction payment;

"(3) be used to provide loans or grants to owners of rental housing, except that rental rehabilitation assistance provided under this subsection for any structure shall not exceed 75 per centum of the total costs associated with the rehabilitation of that structure;

"(4) be used to provide other comparable assistance that the Secretary deems appropriate to carry out the purpose of this section, designed to reduce the costs of such repair and rehabilitation in order to make such housing affordable by persons of low income and, to the extent feasible, by persons and families whose incomes do not exceed 50 per centum of the area median income;

"(5) benefit low- and very low-income persons and families in rural areas, without causing the displacement of current residents; and

"(6) raise health and safety conditions to meet those specified in section 509(a).

Ante, p. 1242.
Funding allocations.

"(c)(1) The Secretary shall allocate rehabilitation grant funds for use in each State on the basis of a formula contained in a regulation prescribed by the Secretary using the average of the ratios between—

"(A) the population of the rural areas in that State and the population of the rural areas of all States;

"(B) the extent of poverty in the rural areas in that State and the extent of poverty in the rural areas of all States; and

"(C) the extent of substandard housing in the rural areas of that State and the extent of substandard housing in the rural areas of all States.

Uncommitted funds.

42 USC 1474.

Any funds which are allocated to a State but uncommitted to grantees will be transferred to the State office of the Farmers Home Administration in a timely manner and be used for authorized rehabilitation activities under section 504.

"(2) Unless there is only one eligible grantee in a State, a single grantee may not receive more than 50 per centum of a State's allocation.

Activity statements by grantees.

Public availability.

"(d)(1) Eligible grantees may submit a statement of activity to the Secretary at the time specified by the program administrator, containing a description of its proposed rehabilitation program. The statement shall consist of the activities each entity proposes to undertake for the fiscal year, and the projected progress in carrying out those activities. The statement of activities shall be made available to the public for comment.

"(2) In preparing such statement, the grantee shall consult with and consider the views of appropriate local officials.

Evaluation by Secretary.

"(3) The Secretary shall evaluate the merits of each statement on the basis of such criteria as the Secretary shall prescribe, including the extent—

"(A) to which the repair and rehabilitation activities will assist persons of low income who lack adequate shelter, with priority given to applications assisting the maximum number of persons and families whose incomes do not exceed 50 per centum of the area median income;

"(B) to which the repair and rehabilitation activities include the participation of other public or private organizations in providing assistance, in addition to the assistance provided under this section, in order to lower the costs of such activities or provide for the leveraging of available funds to supplement the rural housing preservation grant program;

§1940.575 *Section 515 Rural Rental Housing (RRH) loans.*

(a) *Amount available for allocations.* See §1940.552 (a) of this subpart.

(b) *Basic formula criteria, data source and weight.* See §1940.552 (b) of this subpart.

The criteria used in the basic formula are:

(1) State's percentage of National rural population,

(2) State's percentage of National number of rural occupied substandard units, and

(3) State's percentage of National rural families with incomes below the poverty level.

Data source for each of these criterion is based on the latest census data available. Each criterion is assigned a specific weight according to its relevance in determining need. The percentage representing each criterion is multiplied by the weight assigned and summed to arrive at a State factor (SF).

SF = (criterion No. 1 x weight of 33 1/3%)+
(criterion No. 2 x weight of 33 1/3%)+
(criterion No. 3 x weight of 33 1/3%)
(Revised 8-14-85, PN 975.)

(c) *Basic formula allocation.* See §1940.552 (c) of this subpart. The basic formula allocation (BFA) for an individual State is equal to:

BFA = (Amount available for allocation - NO reserve
-Total base and administrative allocations) x SF.

(d) *Transition formula.* See §1940.552 (d) of this subpart. The transition formula first checks whether the current year's basic formula allocation is within the transition range (+ or - percentage points of the proportional amount of the previous year's BFA).

$$\text{Transition Range} = 1.0 \pm \frac{\%\ \text{range}}{100} \ \text{X} \ \left(\frac{\text{amount available for BFA this year}}{\text{available for BFA previous year}} \ \text{x State previous year BFA} \right)$$

If the current year's State BFA is not within this transition range, the State formula allocation is changed to the amount of the transition range limit closest to the BFA amount. After having performed this transition adjustment process for each State, the sum of the funds allocated to all States will differ from the amount of funds available for percent of all Section 515 RRH loans had produced one and two bedroom units, without regard to the needs of low-income families. The instructional change, implemented in 1980 and changed again in December 1982, caused FmHA to consider preapplications on a competitive, need structure basis. Put simply it works this way: all preapplications are ranked as received on a weighted-point basis: Those with the most points, and within 75 percent of the total annual allocation of funds are authorized to develop final applications. As loans are approved and funds obligated, additional preapplicants are authorized to proceed so that final applications in process will always be as much as 75% of the annual allocation to the state (and/or district).

The following information on ranking preapplications is reproduced verbatim from FmHA Instruction 1944. 231(b)(3):

(3) All preapplications determined eligible and feasible by the District Director will be immediately evaluated in accordance with the priority processing system established in this Subpart. Preference in selecting and processing loan requests within the annual allocations will be based on the priorities indicated. (Added 12-9-82, SPECIAL PN.)

(i) Projects in areas or communities having a higher percentage of substandard housing. For this purpose FmHA will use the county data provided by the National Office unless better and more specific statewide data approved by the National Office is available for a particular State. If the State mean of substandard housing exceeds 15.0 percent, use Chart A. If the State mean is 15.0 percent or less use Chart B. Forty points to be distributed in the following manner. (Added 12-9-82, SPECIAL PN.)

A	B	
Over 34%	Over 18%	40 points
31-34	17-18	35
27-30	15-16	30
23-26	13-14	25
19-22	11-12	20
15-18	9-10	15
11-14	7-8	10
7-10	5-6	5
0-6	0-4	0

(ii) Projects in areas or communities having the lowest median per capita income. This data will be provided by the National Office. Thirty points to be

§1940.565 Section 502 subsidized Rural Housing loans.

(a) Amount available for allocations. See §1940.552(a) of this subpart.

(b) Basic formula criteria, data source and weight. See §1940.552(b) of this subpart. The criteria used in the basic formula are:

(1) State's percentage of the National number of rural occupied substandard units,

(2) State's percentage of the National rural population,

(3) State's percentage of the National rural population in places of less than 2,500 population,

(4) State's percentage of the National number of rural households between 50 and 80 percent of the area median income, and

(5) State's percentage of the National number of rural households below 50 percent of the area median income.

Data source for each of these criteria is based on the latest census data available. Each criterion is assigned a specific weight according to its relevance in determining need. The percentage representing each criterion is multiplied by the weight factor and summed to arrive at a basic State factor (SF)

SF=(criterion 1 x weight of 25%)+
(criterion 2 x weight of 10%)+
(criterion 3 x weight of 15%)+
(criterion 4 x weight of 30%)+
(criterion 5 x weight of 20%)

(c) Basic formula allocation. See §1940.552(c) of this subpart.

(d) Transition formula. See §1940.552(d) of this subpart. The percentage range used for Section 502 subsidized RH loans is plus or minus 15.

(e) Base allocation. See §1940.552(e) of this subpart. Jurisdictions receiving administrative allocations do not receive base allocations.

(f) Administrative allocations. See §1940.552(f) of this subpart. Jurisdictions receiving formula allocations do not receive administrative allocations.

(g) Reserve. See §1940.552(g) of this subpart.

§1940.566 Section 504 Housing Repair Loans.

(a) Amount available for allocations. See §1940.552(a) of this subpart.

(b) Basic formula criteria, data source and weight. See §1940.552(b). The criteria used in the basic formula are:

(1) State's percentage of the National number of rural occupied substandard units, and

(2) State's percentage of the National number of rural households below 50 percent of area median income.

Data source for each of these criteria is based on the latest census data available. Each criterion is assigned a specific weight according to its relevance in determining need. The percentage representing each criterion is multiplied by the weight factor and summed to arrive at a basic State factor (SF).

SF=(criterion No. 1 x weight of 50%)+
(criterion No. 2 x weight of 50%)

(c) Basic formula allocation. See §1940.552(c) of this subpart.

(d) Transition formula. See §1940.552(d) of this subpart. The percentage range used for Section 504 Housing Repair Loans is plus or minus 15.

(e) Base allocation. Not used.

(f) Administrative allocations. See §1940.552(f) of this subpart. Jurisdictions receiving formula allocations do not receive administrative allocations.

(g) Reserve. See §1940.552(g) of this subpart.

(h) Pooling of funds. See §1940.552(h) of this subpart.

(1) Mid-year: If used in a particular fiscal year, available funds unobligated as of the pooling date are pooled and redistributed based on the formula used to allocate funds initially.

(2) Year-end: Pooled funds are placed in a National Office reserve and are available as determined administratively.

(i) Availability of the allocation. See §1940.552(i) of this subpart.

metropolitan washington
COUNCIL OF GOVERNMENTS
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August 14, 1987

Dr. Wendy Gramm, Administrator
Office of Information and Regulatory Affairs
U.S. Office of Management and Budget
Old Executive Office Building
17th Street and Pennsylvania Avenue, N.W.
Washington, D.C. 20503

Dear Dr. Gramm:

The Council of Governments is the regional organization of the Washington area's major local governments and their governing officials. COG works toward solutions to such regional problems as growth, transportation, inadequate housing, air pollution, water supply, water quality, economic development and noise, and serves as the regional planning organization for Metropolitan Washington.

The Council of Governments is the Co-State Data Center for the District of Columbia and responds to very numerous requests for tape retrievals and printed information from the decennial censuses. These data are used by local and state governments, citizens and businesses to develop plans and programs, comply with regulations and make investment decisions.

I request that your office reconsider plans to eliminate or merely use a sample of important questions from past censuses in the 1990 Census. The housing questions slated for deletion provide information available nowhere else and have been of significant use to public agencies and private developers in deciding where to focus resources and to invest. For example, information on the "value of condominium or home" and the "amount of monthly rent" are used by persons and businesses to evaluate business sites and their market potential.

Local governments in the area make use of the housing data to attract private sector investment in housing. Without the breadth of the data proposed for elimination, we would lose a valuable set of trend information for which there is no unbiased substitute, and would be forced to turn away inquiries for the data from investors, banking institutions

District of Columbia • Arlington County • Fairfax County • Loudoun County • Montgomery County • Prince George's County • Prince William County
Alexandria • Bowie • College Park • Fairfax • Falls Church • Gaithersburg • Greenbelt • Rockville • Takoma Park

and developers who need such information for market analyses leading to investment decisions and sound economic development.

COG's Transportation Planning Board has commented separately on the importance of the transportation information proposed for deletion. Their request that you not delete what has proven to be a useful, accurate and universally acceptable data base on computing travel, both within the Washington area and in urban areas throughout the United States, warrants restatement. As the Washington urban area continues to spread farther into Virginia and Maryland based in great part on federal government activities, there is even greater need to have a reliable information base to use in attempting to address transportation problems affecting the efficiency of the federal government in its seat of government.

The Washington metropolitan area is growing more rapidly than at any time since the 1960s, and all of that growth is due to births and migration. The proposed deletion of fertility questions would seriously undercut the capabilities of family planning and population projection efforts closely linked to local government services. We continually disappoint business research departments with our inability to provide current migration data for corporate investment decisions, and have joined them in eagerly awaiting the migration data from the 1990 Census. Elimination of the migration question would greatly lessen the value of the Census to save a very small sum.

We would be pleased to respond to any questions you may have in this regard. Please contact John C. McClain of my staff if we may assist you in any way.

Sincerely yours,

A. Jay Langford for

Walter A. Scheiber
Executive Director

cc: Hon. Mervyn M. Dymally
Mr. William P. Butz
Members of Congress, Washington Region

August 17, 1987

Reply: Stephen M. Hayes
Document Center
Hesburgh Library
University Of Notre Dame
Notre Dame, IN 46556-5629

Mr. Donald R. Arbuckle,
Office of Management and Budget
NEOB
17th Street between PA. Ave & H St., N.W.
Washington, D.C. 20503

Dear Mr Arbuckle;

The Government Documents Round Table (GODORT)of the American Library Association does not support the Office of Management and Budget's (OMB) July 24, 1987 recommendation that questions should be dropped from the 1990 Census Dress Rehearsal questionnaire. Data from these questions are needed at the national, state and local level in order to facilitate planning for the following decade.

The Bureau of the Census for the past two years has been conducting public hearings and seminars concerning the exact questions of the 1990 Census, the usability of the data, the geographic specificity required, the statistical validity and reliability and a broad range of other issues; in other words, the same issues raised by the OMB. The Census Bureau concluded that the questions are needed and appropriate and the data vital and usable. Sufficient information exists within the transcripts and reports of these hearings and seminars to meet any apprehensions the Office of Management and Budget might raise.

GODORT appreciates the Office's attempt at reducing the paperwork burden on the American people but wonders at the advisability of the OMB, with its wide range of responsibilities and its limited staff and expertise, to question what has taken a much larger and more specialized agency two years of extensive investigation to develop and verify.

Based on the experience of its members and relying on the two hundred years of experience the Bureau of the Census has in conducting decennial censuses, GODORT supports the 1990 Census Dress Rehearsal Questionnaire as originally proposed by the Bureau of the Census.

The Round Table appreciates the opportunity to comment and offers its services in providing the Office of Management and Budget with any further information.

Respectfully,

Stephen M. Hayes, Chair
Government Documents Round Table --
American Library Association.

cc: Sen. Paul Sarbanes, Senate of the United States
Mr. William P. Butz, Bureau of the Census

The Gerontological Society of America
RESEARCH, PRACTICE AND EDUCATION IN AGING
1411 K STREET, N.W., SUITE 300, WASHINGTON, D.C. 20005 • (202) 393-1411

August 18, 1987

The Honorable Paul Sarbanes
Chairman
Joint Economic Committee
SDOB, Room G-01
Washington, D.C. 20510-8002

Dear Senator Sarbanes:

We would like to request that the attached letter to The Honorable James Miller, III, Director of the Office of Management and Budget, be made part of the record of the Joint Economic Committee's hearing held August 7.

Thank you.

Sincerely yours,

Linda Krogh Harootyan

Linda Krogh Harootyan
Director of Information

Attachment

The Gerontological Society of America
RESEARCH, PRACTICE AND EDUCATION IN AGING
1411 K STREET, N.W., SUITE 300, WASHINGTON, D.C. 20005 • (202) 393-1411

August 5, 1987

The Honorable James C. Miller, III
Director
Office of Management and Budget
Washington, DC 20503

Dear Mr. Miller:

The Gerontological Society of America strongly opposes the Office of Management and Budget's belated attempt to engage in policymaking with regard to the 1990 Census of Population and Housing.

There are several reasons why we oppose OMB's recommendation, which was made public last week. The process of developing the questions for the 1990 Census has been going on at least since 1984. This process has involved the participation of citizens and professionals at sixty-five local public meetings nationwide; solicitation of comments from organizations, both public and private, including identification of governmental data needs through ten subject-based interagency working groups and the Federal Agency Council; and formation of and consultation with minority and technical advisory committees.

Following this extensive process, the Census Bureau tested the resulting recommended questions in the National Content Test, a test census program, and special-purpose surveys. The results of these tests formed the basis of a final proposal submitted to Congress on March 27, 1987, listing the subjects to be covered and the types of information to be compiled. OMB was fully informed of these activities.

Now, four full months after the submission of the proposed Census to Congress, on July 24 the Office of Management and budget issued objections. These objections disregard the painfully thorough process of content development; substitute the judgement of OMB staff for the professional opinions of the Census staff, as well as the input of thousands of citizens, experts, business leaders, and government users of the Census; and eliminate the Congress from its proper oversight role.

If the Office of Management and budget wishes to shorten the Census form, any deletions should be made by the professionals at the Census Bureau and by the relevant Congressional committees, who are in the best position to know which, if any, of the questions can be eliminated with the least loss of information necessary to govern the country.

In addition to general concerns about the process by which OMB recommended cuts in Census coverage, and the judgement used to recommend specific items for cuts, there are a number of questions slated for elimination that, if left unasked, will seriously compromise the ability of the country to respond to the challenge of an aging population. Of particular concern to The Gerontological Society of America are the questions slated to be eliminated regarding residential mobility, fertility, labor force participation, and housing costs.

Residential Mobility

Census data has been used to study the state-to-state migration patterns of older Americans from 1960 to 1980. Since movers tend to be more affluent than non-movers, particularly among those aged 65 to 74, these studies have important fiscal implications for states that are losing relatively affluent, healthy taxpayers, and for those that are gaining that same population. Retirees have a major impact on the economies of the areas into which they move and where they spend their Social Security and pension incomes, while removing equal resources from the areas they leave.

A small but significant stream of migrants move back to their place of origin when their health deteriorates to live closer to their families and long-term friends. This type of migration has important effects on the health-care systems of receiving states, and, therefore, must be tracked and planned for, so that the demands of the rapidly aging population can be properly addressed.

Work on these issues can continue only if the question on mobility is included in the Decennial Census.

Fertility

Because researchers estimate that as much as 80 percent of long-term care of the elderly is provided by informal caregivers, primarily children, one consequence of reduced lengths-of-stay in hospitals will be more reliance on care provided by families, particularly by children. However limited, the Census question on fertility is perhaps the only way we have to discover the proportion of childless elderly today and in the future. Knowing what proportion of the elderly has no children to provide care can help plan local level service delivery. Where should institutional resources be targeted to provide services to the childless who may also be widowed or never-married? Are there regional differences in accessibility to family support that need to be taken into account?

Despite the tremendous financial burden that illness in old age places on the states and on families, questions of resource allocation to provide substitute care when there are no children available cannot be answered without the Census question on fertility.

Labor Force Participation

Despite the fact that the majority of eligible elderly persons collect Social Security income, one major source of income to people over the age of 65 is earnings. It has been very difficult for analysts to define the concept of "retirement," since so many people collecting pensions or Social Security also work at least part-time. It will be impossible to discover, on a national scale, the true nature of workforce participation among the elderly without the current questions on working slated to be eliminated from the Census. Such information is critical to developing private and pulbic sector employment policies for older persons.

Housing Costs

The largest financial asset for most elderly-headed families is a fully paid-for home. Nearly four out of five elderly homeowners own their residence free and clear. Consequently, homes represent a huge economic resource for the elderly, and a growing effort to tap that resource through home equity conversion schemes may enable elderly to draw on their own resources without resorting to governmental programs. However, no good analysis of the potential of homes in specific areas to unlock equity can be made without the Census-derived information on housing costs.

In addition, one of the most significant problems facing elderly renters today is the cost and quality of their housing. Nearly one-half of all elderly renters pay almost forty percent of their incomes for housing, leaving little for such necessities as food, health care, and transportation. The proposed deletion of all questions regarding housing costs will make it difficult for policymakers, especially those working at the local level where the Census provides virtually all of the information on these issues, to determine the housing cost burdens of elderly renters.

The Society respectfully urges the Office of Management and Budget to reconsider its recommendations which would damage the public and private sector's ability to develop effective, cost-efficient responses to the challenge posed by the aging of our population.

Sincerely,

John M. Cornman
Executive Director

JMC/ARW/dp

xc: Donald R. Arbuckle, Office of Management and Budget
William P. Butz, Bureau of the Census
Senator Thad Cochran
Senator Phil Gramm
Senator Charles Grassley
Senator John Heinz
Senator John Melcher
Congressman Jack Brooks
Congressman Mervyn Dymally
Congressman Edward R. Roybal
Congressman Neal Smith
Congressman Henry Waxman

United States
of America

Congressional Record

PROCEEDINGS AND DEBATES OF THE 100th CONGRESS, FIRST SESSION

Vol. 133 WASHINGTON, THURSDAY, AUGUST 20, 1987 *No. 134*

House of Representatives

The House adjourned August 7. Its next meeting will be held on Wednesday, September 9, 1987, at 12 noon.

Senate

THURSDAY, AUGUST 20, 1987

NOTICES OF HEARINGS

SPECIAL COMMITTEE ON AGING

Mr. MELCHER. Mr. President, I would like to announce for the public that the Senate Special Committee on Aging has scheduled a field hearing on "Prescription Drugs and the Elderly: The High Cost of Growing Old—Part II."

The hearing will take place on Thursday, August 27, 1987, at 9:30 a.m. at the Pulaski Heights United Methodist Church, Woodlawn and Monroe Streets, in Little Rock, AR. The hearing will be chaired by committee member, DAVID PRYOR.

For further information please contact Max Richtman, staff director at (202) 224-5364 or Theresa Forster at (202) 224-2363.

Mr. President, I would like to announce for the public that the Special Committee on Aging has scheduled a hearing to receive testimony on the progress in enforcing and administering the Age Discrimination in Employment Act.

The hearing will take place on Friday, September 11, 1987 at 10 a.m. in room 628 of the Dirksen Senate Office Building.

For further information please contact Max Richtman, staff director, at (202) 224-5364.

THE 1988 CENSUS DRESS REHEARSAL

Mr. SARBANES. Mr. President, on August 7 of this year the Joint Economic Committee held a hearing on the potential effects of the proposal by the Office of Management and Budget to drop from the 1988 census dress rehearsal roughly 30 questions hitherto scheduled for inclusion. The hearing reflected the longstanding concern of the Joint Economic Committee for the quality of the Federal statistical infrastructure and the belief that access to accurate, comprehensive and timely data is indispensable to sound decisionmaking. While full and reliable statistical information does not, in itself, constitute or inevitably lead to sound decisions, it plays an essential role in responsible decisionmaking in both the private and public sectors.

Because questions deleted from the 1988 dress rehearsal would also be omitted from the official 1990 Decennial Census, and because the proposed deletions would affect such critical areas as housing, employment and unemployment, transportation, mobility, and energy, the long-term ramifications of the OMB proposals require very careful examination. Unfortunately the proposals were announced only on July 24 with September 14 the final deadline for all public comment, and the August 7 hearing was therefore an effort to draw together, on very short notice, the analyses now being developed by major users of census data all across the country. Given the short time available, many were able to submit their documentation only subsequent to the hearing, and I ask to have included in the RECORD but a few representative examples of the materials which reached the Joint Economic Committee shortly after the August 7 hearing:

The material follows:

NATIONAL GOVERNORS' ASSOCIATION,
Washington, DC, August 6, 1987.

HON. PAUL S. SARBANES,
Chairman, Joint Economic Committee, U.S. Congress, Washington, DC.

DEAR MR. CHAIRMAN: Thank you for the opportunity to comment on the Office of Management and Budget attempt to eliminate critical questions from the Census questionnaires to be used in the 1988 Dress Rehearsal. As this information is vital to the functioning of our State governments, we have been particularly attentive to Census issues. In a letter of May 14, 1987 to Senator Pryor, Chairman, Subcommittee on Federal Services, Post Office, and Civil Service, U.S. Senate, we communicated support for the proposed 1990 Census content submitted to Congress by the Census Bureau. We believe that the items, determined through the extensive content development and testing program of the Bureau, represent the key items that are most important for decision making at the state level.

We, of course, were quite surprised to learn of the proposed OMB changes to the 1990 Census content. It is our understanding that OMB has been involved for a number of years in the formal mechanisms the Census Bureau established to identify data needs for the next Census. We are aware that OMB representatives not only participated in the local public meetings as observers but as participants in the subject-based inter-agency working groups of the Bureau. In addition, OMB established the Federal Agency Council on the 1990 Census specifically to participate in the content development process. They also participated in the budget review process that approved the local public meetings and related content development and testing activities of the Bureau. To our knowledge, throughout the process, OMB raised no significant concerns that would lead to the proposed elimination of roughly 30 questions. The OMB proposed question deletions, in fact, come at a time after the content development process peaked with the submission of the pro-

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● This "bullet" symbol identifies statements or insertions which are not spoken by a Member of the Senate on the floor.

posed content to Congress in March of this year.

The 1990 content subjects proposed to Congress have survived the winnowing process imposed by the Bureau to reduce the vast number of questions that were requested during the national public comment process. Five broad principles guided the Bureau's selection of the subjects to be included in the 1990 Census. It is interesting that three of the five principles used by the Census Bureau for content selection appear as criteria used by OMB to delete questions.

Particularly troublesome is the fact that, the OMB has cited its responsibility under the Paperwork Reduction Act as a basis for its actions. This appears to us to be an inappropriate interpretation of the authority provided in the language of the Act. We do not believe the intent of the Act was to have a single agency's action supercede and overturn an entire data content development process including an extensive public comment mechanism and Congressional action.

Regarding paperwork reduction, we generally believe the potential for duplication and paperwork burden will only increase during the 1990's, if the content is changed as proposed by OMB. The questions slated for deletion are not superfluous, as Census Bureau documentation is likely to show. And additionally, by eliminating the 30 specified questions, the policy uses of the remaining 1990 Census questions will decrease. The subjects as presented to Congress are consistent, for the most part, with the 1980 Census which enhances the comparability of data between the decades. The elimination of items will diminish this benefit.

Several specific aspects of the OMB rationale warrant comment. While we cannot replicate, here in this letter, the tens of thousands of person hours involved in documenting how the data meet the pre-determined criteria for selection, we can offer a few specific examples.

First, OMB cites the fact that there are alternative sources available for obtaining the data in the questions proposed for deletion. We believe that there are no adequate substitutes for these data. These data not only serve to describe the demographic and housing conditions of the country in 1990; but the Census results also serve as benchmarks for numerous data series and play a key role in survey design work throughout the decade. Survey data are not adequate as a substitute for a variety of reasons including the fact that analysis is most often needed at highly localized geographic levels. For example, the Current Population Survey (CPS) would not be an adequate substitute for the labor force questions. The data obtained from surveys, such as the CPS, which is based on a national sample of households, contains detailed data for only a limited number of states and is therefore not sufficient in geographic detail for 50 state use.

Administrative records have limitations as well when being considered for use as alternative sources of data to the Census. For example, the IRS administrative data containing tax filers' addresses, if used as proxy for migration, by matching records over time, may indicate relative change in migration patterns during a specified time period but could not be used to estimate the levels of migration. We understand also that most of the IRS address records, included in attempts to report matches, remain unmatched. Another example is the fertility data which are used in the population projections process. Birth certificate data are not an adequate substitute.

Second, OMB further stated that there was a scarcity of documented evidence that the data resulting from the census would serve important purposes. Several examples will illustrate that these data are crucial for state policy planning, program enactment and fund allocation. The fertility and migration data are used by State Education agencies to adjust school enrollment estimates that are used to allocate State education funds, which average about 37% of annual state budgets, to purchase textbooks and other materials and to employ staff. Another example is the housing questions such as tenure, rent, mobility and the type of rooms in the unit. As the nature of housing problems shifts, from a focus on housing quality to affordability, state housing agencies must create an adequate baseline of housing finance data.

A third point raised by OMB was that the data in the questions targeted for deletion are not needed at highly localized geographic levels. The 1990 Census is the most crucial of the data resources available to aid transportation officials manage the shifting size and character of work-trip commuting that is placing strong demands on the local transportation infrastructure. Census journey-to-work questions have been particularly important determinants in examining the transportation planning process and dispelling population change as a principal indicator to support transportation improvements. In addition, the data are vital to the areas of traffic operations and management, transport system planning and development, transit routing and system planning, government organization and programs and metropolitan development and governance.

Data reliability, another concern of OMB, is reasonable, however it should not be the sole basis to eliminate questions that have been determined to be essential by other criteria. The solution to data reliability questions is not to eliminate the data from the data collection test. Rather these are the items that should be included on the 1988 Dress Rehearsal questionnaires so that the reliability issues can be addressed and the data collection methods improved by 1990.

In closing, we believe that the process undertaken by the Census Bureau was thorough and perhaps the most intensive in the history of Census taking preparation. Taking this extensive public involvement process into account, along with the role Congress has played and will play in overseeing Census activities, the Congress may well want to revisit the role of the Paperwork Act activities in relation to Census activities and consider exempting the Census questionnaire from such provisions.

Again we appreciate the opportunity to express our views on the 1990 Census.

Sincerely,

RAYMOND C. SCHEPPACH.

STATE OF GEORGIA,
OFFICE OF PLANNING AND BUDGET,
Atlanta, GA, August 10, 1987.

Hon. PAUL SARBANES,
Chairman, Joint Economic Committee, Dirksen Senate Office Building, Washington, DC.

DEAR CHAIRMAN SARBANES: Enclosed is a copy of the response from Governor Joe Frank Harris to the proposed changes in the content of the 1990 Census of Population and Housing.

This is to request that Governor Harris' letter be included in the Record of Hearing held August 7, 1987, regarding the Office of Management and Budget's proposed deletions.

Thank you for your assistance.

Sincerely,

CLARK T. STEVENS,
Director.

STATE OF GEORGIA,
OFFICE OF THE GOVERNOR,
Atlanta, GA, August 7, 1987.

WENDY GRAMM, Ph.D.,
Administrator, Office of Information and Regulatory Affairs, U.S. Office of Management and Budget, Washington, DC.

DEAR DR. GRAMM: This letter is in response to the Office of Management and Budget's proposed changes in the content of the 1990 Census of Population and Housing. Census data is widely used in Georgia for policy making, planning, program development, and in many other areas. We have often needed more data than that which was available from the decennial censuses; therefore, the proposed deletions of some questions from the 1990 questionnaires is very disturbing. Although some of the data may be available in the form of estimates from private vendors, much of the data can only be obtained from the decennial Census of Population and Housing.

In particular, from the population section, the data on residence five years ago and transportation/time to work (questions 14 and 23-24) is widely used for determining migration trends and transportation planning. Also, data on work and transportation disabilities is very difficult to obtain and affects such a small percentage of the total population, that to move those questions to the sample form may seriously affect the availability and validity of the resulting data.

With regard to the housing section, this data is used to target housing revitalization efforts, to determine low income energy assistance payments, weatherization programs, community development block grants, and for a variety of other planning functions. Deleting these questions, especially question numbers H6, 9, 10a, 12, 13, 15-18, and 21-28, would seriously impact numerous programs and policy decisions in Georgia.

It is with these points in mind that I request that you reconsider the decision to delete these questions from the 1990 census.

With kindest regards, I remain

Sincerely,

JOE FRANK HARRIS.

[Telegram]

CARMEL, CA, *August 7, 1987.*

Senator PAUL SARBANES,
Chairman, Joint Economic Committee, Dirksen Senate Office Bldg., Washington DC.

Thank you for your attention to the problems that would be created by the elimination of important housing employment and transportation questions from the 1988 census dress rehearsal and ultimately from the 1990 census. Yesterday, the U.S. Conference of Mayors notified the Office of Management and Budget that it opposed the proposal to drop these questions. This is a time when all levels of government must stretch scarce resources to meet growing needs, it is not a time to take away the data we need to manage those scarce resources or measure those growing needs.

Members of the executive committee and advisory board, U.S. Conference of Mayors, assembled August 7, 1987; Richard L. Berkley, mayor of Kansas City, President.

STATE OF MARYLAND,
REGIONAL PLANNING COUNCIL,
Baltimore, MD, August 10, 1987.

Hon. PAUL S. SARBANES,
U.S. Senate, Dirksen Senate Office Building, Washington, DC.

DEAR SENATOR SARBANES: I want to bring to your attention the Regional Planning

Council's (RPC's) concerns over recent developments regarding the upcoming 1990 Census. The Office of Management and Budget (OMB) has asked the Census Bureau to shorten the Draft 1990 Census Survey Questionnaire dramatically. They propose accomplishing this through the elimination of several questions relating to the labor force status and commute to work of resident workers, population migration patterns, and housing cost indicators.

The RPC is concerned that information essential to our work will be eliminated if the OMB plan is implemented. The proposed deletions are particularly disconcerting in light of the extensive review, refinement, and public outreach process undertaken by the Census Bureau in developing the original questionnaire—a process which has yielded a fair compromise between the needs of the many local, state and federal agencies requiring accurate census information. Enclosed is a copy of a letter sent to OMB by the Executive Director of RPC which presents critical comments from a planning staff perspective.

We would greatly appreciate your consideration of this matter and support in the upcoming Congressional Hearings.

Thank you for your concern.

Sincerely,

George F. Harrison, Jr.,
Chairman.

State of Maryland,
Regional Planning Council,
Baltimore, MD, August 7, 1987.

Donald R. Arbuckle
Assistant Chief, OIRA, Office of Management and Budget, New Executive Office Building, Washington, DC.

Dear Mr. Arbuckle: The purpose of this letter is to communicate the concern of the Baltimore Regional Planning Council staff over the proposed deletion of questions on the most recent Draft 1990 Census survey questionnaire. The proposal set forth by the Office of Management and Budget calls for the elimination of questions relating to the labor force status and commute to work of resident workers, population migration patterns, and housing cost indicators. Failure to provide for a systematic, consistent national data collection effort on these items as part of the decennial census effort would restrict our future work at both a local and metropolitan level and hinder our ability to conduct comparative analyses with prior years' data and with other regions of the country.

The current census format is the product of an extensive review, refinement, and public outreach program administered by the Census Bureau in recent years. The questionnaire now represents a fair compromise among the various groups that offered input during the public hearing process. Introducing major changes at this point would violate that process.

The proposed changes will limit the base of observed statistics on key transportation, demographic, and housing indicators. This information, as collected through past census efforts, has been relied upon heavily for preparing and checking our planning forecasts and in detecting and monitoring emerging trends at the metropolitan level and below. In addition, the availability of statistics for other regions has bolstered our ability to compare regional and subarea patterns against those of other regions of the country.

Census-reported statistics on commuting have proven to be a valuable data resource in understanding the travel-generating characteristics of various types of development. Small area data on automobile ownership patterns, reported travel mode, and time for commuter trips have contributed greatly to transportation planning studies focusing on current, as well as long-range, issues facing the region and its political jurisdictions.

The availability of these data items in a consistent format, for both the local area and other areas across the nation, has enabled us to respond to information needs which extend beyond the immediate Baltimore area. For example, recent transportation studies conducted with the Metropolitan Washington Council of Governments required the integration of small area census data for 1980 from both the Baltimore and Washington, D.C. regions. Much of this work could not have been performed had the information on travel time and mode not been available for both regions in a consistent, small-area format.

In addition, census data on housing and population have proven critical to our work in transportation, economic development, and human resource planning. Our agency relies upon this information to support studies of housing quality, affordability, and adequacy. Census-reported information on birth rates and migration patterns in relied upon heavily by state and local agencies in demographic trends analysis and forecasting efforts. These socioeconomic forecasts, in turn, form the basis for critical decisions on infrastructure planning and improvements at all levels of government.

Finally, we are planning to use local funds to support a data collection effort which will complement the 1990 census. Prior to and during the census effort, we intend to collect information on noncommuting travel behavior, as well as overall transportation systems usage. The proposed questionnaire deletions would undermine and invalidate this local initiative and no doubt similar local initiatives being taken across the nation. To undertake a large data collection effort compensating for the proposed delections would far outstrip the funding resources available for planning in the region.

In summary, we feel that the 1990 Census will be seriously weakened if the proposed Office of Management and Budget recommendations are implemented. We feel that the census format originally proposed by the Census Bureau should be retained.

Sincerely,

Alfred P. Gwynn,
Executive Director.

Consortium of Social
Science Associations,
Washington, DC, August 7, 1987.

Hon. Paul Sarbanes,
Chairman, Joint Economic Committee, Dirksen Senate Office Building, Washington, DC.

Dear Senator Sarbanes: We applaud your calling hearings concerning the attempt by OMB to eliminate and downgrade questions concerning housing and other important issues from the 1990 census questionnaire.

The enclosed letter indicates our feelings about this unfortunate policy proposal from OMB. As an organization that has spent the past few years investigating OMB's attempts to diminish information collection, (we helped the House Science and Technology Committee to push for a GAO investigation of OMB's information collection clearance policies), we hope you will use all the power at your disposal to stop this proposal from going forward.

The Consortium of Social Science Associations (COSSA) represents 185,000 American scientists across the broad range of social and behavioral science disciplines. A list of COSSA Members, Affiliates, and Contributors is attached.

Thank you for your time and attention. If you have any questions please feel free to call us.

Sincerely,

Howard J. Silver,
Associate Director for Government Relations.

Enclosure.

Consortium of Social
Science Associations,
Washington, DC, August 6, 1987.

Hon. James C. Miller, III,
Director, Office of Management and Budget, Washington, DC.

Dear Director Miller: I am writing to express COSSA's concern about OMB's proposal to eliminate certain items from the 1988 Census Dress Rehearsal Questionnaire and to downgrade others to the sample component of that questionnaire. The collection of information, particularly in the methodical way of the decennial census, should be a major responsibility of the national government in a federal system. Good public policy planning and analysis depend on good data. The Paperwork Reduction Act should not be utilized to justify the loss of information vital to those who must make public and private policy decision affecting the future of this nation.

Data on housing and household trends which you propose to eliminate reveal future needs, not only for housing and construction, but for highways, schools, water and sewer lines, and other services and facilities important to state and local governments. Researchers in housing policy note that your proposed elimination and downgrading of housing items will make it difficult to collect crucial data necessary for local planning agencies to qualify for Federal programs. For example, the development of Housing Assistance Plans necessary for Community Development Block Grant applications require the kind of data you propose to eliminate. In addition, the need to measure physical quality and affordability and the need to estimate energy consumption and expenditures will also be lost. Many states and localities rely on the data from the housing census to develop housing needs profiles and to provide benchmarks in developing follow-up studies. State and local government collection of this data would not be cost-effective and information collection of this nature should be a federal responsibility. The housing items proposed for elimination should be restored to the questionnaire.

At a time when the Committee on National Statistics of the National Academy of Sciences has recommended the enhancement of fertility statistics, you are proposing to eliminate the question on the census that deals with this important issue. This seems short-sighted and unfortunate. In addition, when warnings of a 'birth dearth' are being debated, accurate information about fertility rates and patterns would help enlighten the debate as it moves from books and magazines to the public policy arena. The fertility item should be restored to the questionnaire.

The Consortium of Social Science Associations (COSSA) represents 185,000 American scientists across the wide spectrum of the social and behavioral sciences, many of whom rely on census data for their research and policy analysis. A list of COSSA's Members, Affiliates, and Contributors is attached.

Thank you for your time and attention.

Sincerely,

DAVID JENNESS,
Executive Director.

HOWARD J. SILVER,
Associate Director for Government Relations.

CONSORTIUM OF SOCIAL SCIENCE ASSOCIATIONS

MEMBERS

American Anthropological Association.
American Economic Association.
American Historical Association.
American Political Science Association.
American Psychological Association.
American Sociological Association.
American Statistical Association.
Association of American Geographers.
Association of American Law Schools.
Linguistic Society of America.

AFFILIATES

American Assembly of Collegiate Schools of Business.
American Association for Public Opinion Research.
American Educational Research Association.
American Society of Criminology.
Association for Asian Studies.
Association for the Social Sciences in Health.
Eastern Sociological Society.
Gerontological Society of America.
History of Science Society.
International Studies Association.
Law and Society Association.
Midwest Sociological Society.
National Council on Family Relations.
National Council for the Social Studies.
North Central Sociological Association.
Northeastern Anthropological Association.
Operations Research Society of America.
Population Association of America.
Regional Science Association.
Rural Sociological Society.
Social Science History Association.
Society for the History of Technology.
Society for Research on Adolesence.
Society for Research in Child Development.
Society for the Scientific Study of Religion.
Southern Sociological Society.
Southwestern Social Science Association.
Speech Communication Association.
The Institute of Management Sciences.

CONTRIBUTORS

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Center for Advanced Study in the Behavioral Sciences.
University of Chicago.
University of Colorado.
Columbia University.
Cornell Institute for Social and Economic Research.
Cornell University.
Florida State University.
Harvard University.
Howard University.
University of Illinois.
Indiana University.
Institute for Research in Social Science, UNC-Chapel Hill.
Institute for Social Research, University of Michigan.
University of Iowa.
The Johns Hopkins University.
University of Maryland.
Massachusetts Institute of Technology.
Maxwell School of Citizenship and Public Affairs, Syracuse University.
University of Michigan.
University of Missouri.
National Opinion Research Center.
University of Nebraska.
New York University.
University of North Carolina, Chapel Hill.
Ohio State University.
University of Oregon.
University of Pennsylvania.
Pennsylvania State University.
University of Pittsburgh.
Princeton University.
Rutgers University.
Social Science Research Council.
University of Southern California.
Stanford University.
State University of New York at Stony Brook.
University of Tennessee, Knoxville.
Texas A & M University.
Tulane University.
University of Virginia.
University of Washington.
University of Wisconsin, Madison.
University of Wisconsin, Milwaukee.
Yale University.

AUGUST 6, 1987.

We, the undersigned, scholars and users of the Census, wish to register our strong objection to the changes in the content of the 1990 Decennial Census of Population and Housing proposed by the Office of Management and Budget.

Our objection is two-fold: we disagree profoundly with the substance of the changes as will be described later in this letter. But we also take equal umbrage with the manner in which these changes are being proposed. Why were these proposals not made long enough ago that they might be discussed at those public meetings whose very purpose it is to examine such matters? Why has so little time been allowed for public response? Why was the summer vacation-time chosen as the period in which to make a brief announcement of what amounts to a major public policy change? If these changes to the Census are in fact worthy ones, then they should be able to bear reasonable, thorough public scrutiny.

As for the substance of the proposed changes, we object in general to dropping questions except those which have become historically irrelevant because questions asked on previous Censuses are an important part of the historical record of the United States. Yet we understand that it is being proposed to drop almost half of the questions. Is it possible that nearly half of the questions on the Census have become obsolete within a ten-year period?

There is far more at stake than the quantity of the information which the Census reveals. It is the quality of the data which would be compromised by dropping many of the questions. The Census alone provides adequate benchmarks for defining the samples of other surveys. Only the Census includes information on as many people as it does. Only the Census combines so much demographic and economic data on such a scale. As an example, consider the labor force questions from the Current Population Survey—the answers to which determine our national employment data. This vital data would be far more biased if the labor force participation questions were dropped from the Census. The real value of questions asked on the Census is that unlike other sources of data, Census provides numbers which can be associated with a wealth of demographic and other material. Losing this connectedness would be a national tragedy.

The principles that are at stake here are: that of responsible governance whereby major public policy changes ought not to be made until they have been publicly and most carefully considered; and that of maintaining the worth of our most important national survey which is done by assuring its quality, its consistency, and its completeness.

Christine C. de Fontenay, Steven S. Smith, Clifford M. Winston, Kenneth S. Flamm, Edward J. Lincoln, Charles L. Schultze, Richard Goode, Gilbert Y. Steiner, Robert A. Katzman, Henry J. Aaron, Martin N. Baily, Edward M. Bernstein, Rose M. Rubin, Ralph C. Bryant, Weir M. Brown, Gary T. Burtless, John S. Earle, Alfred Reifman, Barry Bosworth, Stephen Hess, Samuel Kernell, Bruce MacLaury, Paul E. Peterson.

UNIVERSITY OF NOTRE DAME,
August 10, 1987.

Hon. PAUL SARBANES,
Chairman, Joint Economic Committee, Dirksen Senate Office Building, Washington, DC.

DEAR SENATOR SARBANES: It has come to my attention that the Office of Management and Budget (OMB) has "suggested that certain questions be dropped" from the 1990 Decennial Census questionnaire.

First, the Bureau of Census has held extensive public hearing and seminars soliciting information about the 1990 Census and the questions which should and should not be asked They have volumes of information at their disposal. They are the statisticians of the federal government with a great deal of expertise. To my recollection, I have not heard of any public meetings or seminars being held by the OMB as to questions for the 1990 Census. Just who does OMB think they are and based on what expertise does OMB question the Census on its carefully constructed questionnaire? Particularly at this late date and with little or no public input. Census knows its users and should not be asked to unduely justify questions so important to the nation.

Second, let me provide you with examples of usages by the local level, "nitty-gritty" users of the Census information.

(1) a local bank used the "residence five years ago" to plan its new branch.

(2) The MACOG (Michiana Area Council of Governments) uses the utility information in planning for another oil embargo by identifying areas which would be hardest hit if oil prices escalated. Again, migration information and "mode and travel time to work" is used in charting the growth of the area and planning transportation needs, roads, etc. "Rent and value" is used in tax planning.

(3) Small business uses the statistics in placing new small businesses and assessing expansion of existing business concerns.

(4) Our MBA students use this information in planning their marketing strategies for classroom assignments. This same methodology is then continued by them on the job with large and small firms.

Third, let me address the OMB reasons for deleting the questions.

(1) "A scarcity of documented evidence—such as for policy planning purposed, program enactment or other broadly based public need—that the resulting data would serve important purposes." As stated above the Census Bureau has held extensive hearings and meetings, for which there are transcripts and reports. I, as a participant, have received such transcripts. OMB need only to ask for these. I have also indicated above that the local governmental unit MACOG as well as other city offices (ie. police, transportation,) and small business concerns, all use these statistics. OMB has obviously not checked with any of the local planning groups or local government before putting forth this argument.

(2) "Data resulting from some of the items are not necessary at highly localized geographic levels." The Michiana Area Council of Government is not interested in state level information, neither is the City of South Bend's transportation department. They are interested only in highly localised geographic levels of information directly within their administative view. The small local business is not establishing a nationwide local business and needs only highly localised geographic level information, usually within the city and county. Again, OMB has not checked with the Small Business Administration concerning what information needs the local small business has and what statistical agency or survey answers those questions.

(3) "Some data items are not required uniformly across the nation." Again I differ with the OMB. Most transportation agencies of local government, county or regions will be using the information provided by the Census. True, it may not be uniformly required, but local units through the Census Bureau's State Data Center Program manipulates the given data into useful reports.

(4) "Some are available from alternative sources." In some cases true, but not uniform or reliable source. The difficulties of entering, validating, and merging information from various sources make the resulting statistics less than reliable. The OMB continues to put this reason forward. The Census Bureau has been collecting information for over 100 years. Their methodology and validity is well known and used by the users of statistics. Alternative sources would introduce undue costs and statistical error to any endeavor.

(5) "Some of the questions would yield data that would not be sufficiently reliable." The questions identified by OMB contain less statistical error and are more reliable than others left in the questionnaire. The Census Bureau has been improving the reliability of its statistics and has discussed this issue at its public meetings. The statistical community is well aware of the faults of the statistics but has adapted and is quite capable of using the statistics. The absence of any information is not as desirable as having data with a known statistical error associated with it.

Finally, OMB has waged, in my opinion, a systematic war on the statistical evidence of our nation. In presuming to question the 1990 Census, it is obvious that the OMB does not know about the uses of the statistics the Census provides and that they are unaware of the Census Bureaus continuing program of evaluation. If the OMB had familiarized themselves with the Census Bureau and its programs and the information available to it (OMB), the "suggested" deletions would not have been made.

I am asking that you communicate to OMB (1) that your constituents do use information at the "Highly localized area" and that (2) the OMB should check their facts before assuming that their (OMB) knowledge about the statistical user community and needs of the citizens is better then a much larger, high specialized agency who is constantly reviewing its programs such as the Bureau of the Census.

My time is valuable. The constant battle between OMB and the Statistics-user community is time consuming and wasteful. The Paperwork Reductions Act, used so frequently as a reason for OMB action, has done little to reduce the amount of time and paper I must expend fighting OMB action on statistical and other issues.

I thank you for your attention to this important matter. I will be happy to discuss this with anyone from your office if you would like.

Respectfully,

STEPHEN M. HAYES,
Reference and Public
Documents Librarian.

OFFICE OF COUNTY EXECUTIVE,
Ellicott City, MD, August 7, 1987.

Senator PAUL SARBANES,
Dirksen Building, Washington, DC.

DEAR SENATOR SARBANES: It has come to our attention that the Office of Management and Budget is proposing the deletion of an alarming number of data items from the questionnaire designed for use in the 1990 Census, and Howard County recommends firmly the retention of these questions in order to ensure the retrieval of invaluable data toward the making of informed decisons at the local level.

Therefore, please find attached a copy of my letter addressed to Donald R. Arbuckle of the Office of Management and Budget detailing our reasons for this recommendation, and I shall appreciate your careful consideration and active concurrence with these expressed needs of good government at the local level.

Sincerely,

WILLIAM E. EAKLE,
Acting County Executive.

OFFICE OF COUNTY EXECUTIVE,
Ellicott City, MD, August 7, 1987.

Mr. DONALD R. ARBUCKLE,
Assistant Chief, OIRA, Office of Management and Budget, Washington, DC.

DEAR MR. ARBUCKLE: Since writing a brief letter yesterday to your associate Ms. Wendy Gramm expressing the County's opposition to the deletion of important population, transportation-related and housing questions from the 1990 Census, it has come to our attention that a slightly more detailed rationale for our recommendation is in order.

Accordingly, the following programmatic applications of Census data would be seriously curtailed for this local government by the deletion of these essential questions for the 1990 Census: (1) residence five years ago is a basic factor in immigration and, therefore, population forecasting; (2) mode of transportation to work, carpooling, time of departure and travel time to work are not only key elements in transportation and traffic modeling, but the basis for such essential issues as commuting patterns, land use and highway planning; (3) all questions related to the residential labor force are critical to economic development and planning, and are vital to a County located centrally in the Washington-Baltimore corridor; and (4) each of the housing questions proposed for deletion have provided invaluable data for County planning and decisionmaking in the areas of housing and human service delivery systems. Perhaps the greatest loss, however, would be the ability to cross-tabulate these essential data items for the ongoing process of General Plan development, comprehensive zoning and budgetary forecasts. In addition, much of this information is required in the background narrative for Community Development Block Grant applications, as well as Section 3, Section 4(i) and Section 18 grant applications to the Urban Mass Transit Administration.

For these reasons, we shall be extremely interested in seeing the level of statistical information derived from the decennial Census remain (at the very least) at the fine standard achieved in 1980.

Sincerely,

WILLIAM E. EAKLE,
Acting County Executive.

IBA,
August 7, 1987.

Representative LEE HAMILTON,
Rayburn House Office Building,
Washington, DC.

DEAR REPRESENTATIVE HAMILTON: It has come to our attention that the Bureau of the Census may be reducing the number of questions on the schedule for the 1990 census.

The response to such inquiries during each census provide an invaluable data resource which is used by government agencies, businesses and educational institutions to evaluate the needs of the citizens of our country.

We anticipate you may be interested in this action by the Census Bureau. Enclosed is a photocopy of a letter to Donald R. Arbuckle of the Office of Management and Budget expressing our concerns about reducing the amount of important census data.

Sincerely yours,

WILLIAM H. KING,
Executive Vice President.

INDIANA BANKERS ASSOCIATION,
Indianapolis, IN, August 5, 1987.

DONALD R. ARBUCKLE,
Office of Management and Budget,
Washington, DC.

DEAR MR. ARBUCKLE: We have just discovered that, on the direction of the federal Office of Management and Budget, the Bureau of the Census will have to cut many questions from the schedule for the 1990 Census.

The data which would be lost under this proposal would impair the ability of many forms of business and educators to adequately respond to the needs of the citizens of our county. It would seem that if we are to take the time to conduct a census, the gathering of all pertinent data is extremely important.

We would encourage you to carefully evaluate the need for this data and reconsider its deletion.

Sincerely,

WILLIAM H. KING,
Executive Vice President.

INDIANA 15 REGIONAL PLANNING
COMMISSION, HUNTINGBURG, IN,
AUGUST 7, 1987.

Re 1990 Census.

Mr. DONALD R. ARBUCKLE,
Office of Management and Budget,
Washington, DC.

DEAR MR. ARBUCKLE: I understand that OMB is planning to drop almost half the questions from the 1990 Census Questionnaire. I find this most appalling in light of the great need to evaluate the growth of our country and plan for the needs of the future.

I also do not fully understand what costsaving could be anticipated. Particularly if you compare the cost-savings to the benefits lost!

Please reconsider your proposal and keep the 1990 Census Questionnaire 100% complete.

Thank you for your time and consideration with this matter. Should you have any questions or comments, please call my office.

Sincerely,

ROBERT P. GREWE,
Executive Director.

Lexington Fayette Urban County Government,
Lexington, KY, August 5, 1987.

Hon. Lee H. Hamilton,
Vice Chairman,
Joint Economic Committee,
Washington, DC.

Dear Vice Chairman Hamilton: We just learned of action by the U.S. Office of Management and Budget which could have a very detrimental impact on the functioning of our local government. It relates to a directive issued recently by OMB to the U.S. Census Bureau to cut approximately 30 questions which are scheduled to be included in the 1988 Census Dress Rehearsal in preparation for the 1990 Census. The elimination of these data could seriously impair the planning functions of this government.

My Division of Planning informs me that the loss of certain housing and transportation data would seriously diminish our efforts to assess neighborhood conditions, analyze transportation facilities and target public transit. Specific information needed by the Division of Planning include: value of home, rent, residence five years ago, public sewer, number of bedrooms, number of autos, transportation/time to work, and labor force information.

We utilize these data for all our urban planning as well as for assessing and determining pockets of poverty for purposes of our enterprise zone and certain CDBG and UDAG projects, among myriad other projects. The OMB directive essentially eliminates necessary census data at the block level.

In your review of the aforementioned OMB action, I urge you to consider the very detrimental impact this could have on the functioning of local governments as well as businesses and industries which also rely on these data. Please restore these essential data to the 1988 Dress Rehearsal and the 1990 Census.

Sincerely,

Scotty Baesler
Mayor.

Indiana University,
School of Business,
Bloomington, IN, August 4, 1987.

Congressman Lee H. Hamilton,
Rayburn House Office Building,
Washington, DC.

Dear Lee: OMB is doing it again.

The Office of Management and Budget has instructed the Bureau of the Census to eliminate significant data elements from the 1990 Census. It is disguised as applicable to the St. Louis test run, but it means that vital information would be lost for the full-scale run in 1990.

That directive must be reversed. If not, American business will lose data on, among other things:

The migration of the population;

The value of owner-occupied housing;

The amount of rent paid;

The type of fuels used for water and space heating;

Labor force participation details; and

Transportation to work detail.

Our office serves hundreds of small businesses across Indiana. We know the value of these data, not for academic research (which is not an unworthy cause), but for practical business decisions. The sad part is that the small business owner will think that a reduced questionnaire is to be cheered. The loss will never be known until time of need. Then that same person will wonder why we do not have such data to help him or her and will make some derisive remark about the inadequacy of federal programs.

Please, on behalf of Hoosier businesses, make an effort to protect the 1990 Census from these new destructive incursions by OMB.

Best regards,

Morton J. Marcus
Director.

August 11, 1987.

Mr. Donald R. Arbuckle,
Office of Management and Budget,
Washington, DC.

Dear Mr. Arbuckle: We are writing to express our deepest concern about OMB's decision to eliminate a number of items from the 1990 Census Questionnaire. We are not insensitive to OMB's desire to reduce paperwork for respondents, and we are not in a position to contend that each and every question in the survey is indispensible. But OMB's hit-list of questions seems unreasonably expansive.

Our office frequently receives requests for census data. Over the years, these requests have covered virtually every data item in the census. The community really does use the data—all of the data—produced by the Census Bureau.

As the designated Metropolitan Planning Organization (MPO) for the urbanized area, we are particularly alarmed about the possibility that certain transportation-related questions (travel mode, work travel times, number, of automobiles per household) may be eliminated. This information is necessary for the MPO to meet its federally-required urban transportation planning responsibilities, sepcifically with regard to traffic modeling and forecasting. One of the greatest improvements in recent censuses has been the inclusion of several transportation questions—sparing communities the need to perform (usually with federal funds) expensive and time-consuming surveys.

The Planning Department also makes use of census information related to migration patterns, labor force composition, number of bedrooms, group housing, tenure, and similar items in formulating growth and development policies for the Bloomington urbanized area. This data is important not only to the urban transportation planning process, but also in comprehensive planning matters. We are strongly opposed to OMB's recommendation to eliminate certain questions covering the aforementioned areas, or to move others from the 100% survey to the sample survey.

The Census Bureau did not devise the 1990 questionnaire without considerable input from data users. Our agency has participated in some of the public meetings and workshops sponsored in local and regional areas by the Census Bureau. We understand that the Bureau has also met extensively with congressional representatives, government agencies, special interest groups, and other interested parties as part of the question selection process.

We further reject the notion that much of the data slated for elimination is available through other sources. Only the census consistently provides data at the census tract, neighborhood, and sometimes even at the block level. Moreover, data items which are available elsewhere are usually collected by the Census Bureau for the purpose of permitting ready cross-tabulations with other data.

The decennial census is an invaluable source of information. We believe that OMB's proposed trimming of the 1990 questionnaire would have significant and negative impact on the local planning process. Please reconsider your decision very carefully before action is taken on this matter. The census project is too important to do otherwise.

Thank you for the opportunity to express our opinions.

Sincerely,

Ted E. Skinner,
Senior Planner.
(For Timothy A. Mueller,
Planning Director).

Hoosier Energy,
Rural Electric Cooperative, Inc.,
Bloomington, IN, August 13, 1987.

Mr. Donald R. Arbuckle,
Office of Management and Budget, NEOB,
Washington, DC.

Dear Mr. Arbuckle: It has come to our attention that the Office of Management and Budget has informed the Bureau of the Census that many questions are to be deleted from the 1990 census. While we all object to senseless census questions, we are concerned that additional deletion of questions in the 1990 census will virtually render useless much of the data base we and other utilities use in power requirements studies and consumer marketing surveys.

Of particular interest to us are questions on type of fuel used for space and water heating, number of bedrooms in homes, value of owner occupied homes, amount of rent paid, data on automobile ownership, travel time to work, other means of transportation, and place of residence in 1985, just to mention a few. As well, there are many other questions related to the general areas that these specific questions represent which are of great importance in our marketing and investment planning. Additionally, the thousands of businesses and industries we supply power to in southern Indiana rely on data from the census for their planning, which would be severely affected if any more questions were deleted from the 1990 census.

Thank you for your time and consideration of this most important matter which does directly affect the more than half-a-million residents, businesses and industries we serve.

Sincerely,

Doug Stauch,
Manager of Information Services.

Detroit Regional Census
Advisory Council,
Detroit, MI, August 10, 1987.

Dr. Wendy Gramm,
Administrator, Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC.

Dear Dr. Gramm: The Detroit Regional Census Advisory Council is gravely concerned about the proposed reduction of questions for the 1990 Census. The Council, as indicated by the attached membership list, includes representatives of the major data producers and users in southeast Michigan.

We believe that this decision is ill-advised and should be reversed; the 1988 Dress Rehearsal questionnaire should be approved as submitted by the Bureau of the Census.

The Census Bureau has conducted a long and thorough process leading to development of this questionnaire. Federal government needs were identified through the Federal Agency Council, chaired by your office. Other governmental needs, as well as those of the general public, were ascertained through a long series of local public meetings beginning in 1984. Legislation and governmental regulations requiring use of census data have been reviewed at all levels. *To meet these needs, the questions proposed for deletion must be included.*

Let me cite just a few examples:

• The labor force questions provide data used to determine ratios for estimating unemployment levels and rates for sub-county areas. These are used in Job Training Partnership Act funding.

* The item on place of residence five years ago provides the measurement of migration: the patterns and characteristics of people moving from one place to another. A benchmark derived from these data is important for interpretating migration rates derived from matched income tax returns as used in population estimates. The erstwhile General Revenue Sharing program and others depend on these numbers.

* Rent and value provide the only socioeconomic measure available for very small areas, including voting precincts. The fact that respondents may misstate value, estimating it too high, is unimportant because the item is used to compare one area to another, rather than for its absolute value.

Vehicles available is critical for planning for public transit needs in an era of scarce resources.

The Decennial Census is the premier data collection activity of the nation. Because its constitutionally mandated function requires that every household and every resident be contacted, it is unique as a vehicle for collecting the variety of auxilliary information that is so important for the wide range of planning and decision making over a ten-year period.

For this reason, we do not believe that the Decennial Census should be viewed as a paperwork burden at all. Fifteen minutes, or even 45 minutes, of a household's time once in ten years is a minimal effort to spend for this very important result. If paperwork needs to be reduced, let us find other vehicles for that effort. The Decennial Census should be left alone.

We hope that, with the additional information that has been presented to you by both the Bureau of the Census and the data user community throughout the nation, you will see fit to reverse the decision made on July 24 and proceed forthwith to approve the questionnaire as submitted.

Sincerely,

Patricia C. Becker,
Chairperson.

Enclosure: Membership roster.

Detroit Regional Census Advisory Council Membership List

Donna D. Atkinson, Greater Detroit Area Health Council, Detroit.

Patricia C. Becker, City of Detroit Planning Department, Detroit.

Peter Bernard, Independent Consultant, Detroit.

Claude J. Brittingham, United Community Services, Detroit.

Bill Brown, Livingston County Planning Department, Howell.

Barbara Bryant, Market Opinion Research Co., Detroit.

Dr. Roy J. Buts, Oakland Schools, Pontiac.

Doris Detwiler, Detroit Public Library, Detroit.

Howard Pace, Michigan Bell Telephone Co., Detroit.

Denise Flynn, Washtenaw County Metro Planning Comm., Ann Arbor.

James Frederick, Michigan Cancer Foundation, Detroit.

Judith Goetz, Numbercrunchers, Detroit.

Paul Good, Southeast Michigan Council of Governments, Detroit.

David Hay, Oakland County Planning Division, Pontiac.

Charles Henry, Detroit Police Department, Detroit.

Cornelius Henry, Southeastern Michigan Transit Authority, Detroit.

Don Hoag, Detroit News, Detroit.

Jeffrey Jenks, Michigan Department of Civil Rights, Detroit.

Mark Kohl, Community Mental Health Services, Detroit.

Gordon Lambert, Oakland County Community Develop. Div., Pontiac.

Winston Lang, NAACP—Detroit Branch, Detroit.

Edward Limoges, Southeast Michigan Council of Governments, Detroit.

Von D. Logan, Michigan Employment Security Commission, Detroit.

Amy Majeske, Wayne State University Computing Center, Detroit.

Peter Mallery, St. Clair County Planning Dept., Port Huron.

Ellen McCarthy, Michigan Department of Civil Rights, Detroit.

Donald Morandini, Macomb County Planning Commission, Mt. Clemens.

Jeffrey Moyer, R.L. Polk Co., Detroit.

Frank Nagy, Monroe County Planning Department, Monroe.

Mark Neithercut, MIMIC/CUS, Wayne State University, Detroit.

Michael Ponder, Pontiac School District, Pontiac.

Barbara Rennie, Detroit Urban League, Detroit.

Kenneth Riopelle, Sandy Corp., Troy.

Maurice Roach, Wayne County Office of Economic Develop., Detroit.

Robyn Rontal, Botsford General Hospital, Farm. Hills.

Ronald Ropke, United Foundation, Detroit.

Gary Sands, Development Research Associates, Inc., Plymouth.

William Simmons, National Bank of Detroit, Troy.

Sue Smock, Wayne State Univ., Ctr. for Urban Studies, Detroit.

Denny Stavros, Detroit Public Schools, Detroit.

John R. Steiner, Greater Detroit Chamber of Commerce, Detroit.

Thomasina Tucker, City of Detroit Planning Department, Detroit.

Horacio Vargas, New Detroit, Inc., Detroit.

Susan Wachsberg, Detroit Free Press, Detroit.

Gary Wilson, Michigan Chronicle, Detroit.

Anne Zald, Wayne State University, Purdy Library, Detroit.

Saad E. Zara, Detroit Edison Company, Detroit.

LIAISON REPRESENTATIVES

Dwight Dean, U.S. Bureau of the Census, Detroit.

Robert C. Graham, GLS Region V Planning and Development, Flint.

Kurt Metzger, U.S. Bureau of the Census, Detroit.

Billie Thon, Dept. of Housing and Urban Development, Detroit.

(Mailgram)

Boston, MA, *August 6, 1987.*

Hon. Paul S. Sarbanes,
Joint Economic Committee, Dirksen Senate Office Building, Washington, DC.

Dear Senator Sarbanes: As the officer who maintains Massachusetts records and supervises our State census, I strongly object to the Office of Management and Budgets decision to delete many important questions from the U.S. Census Bureau's long form for the 1990 census.

These questions will provide substantial and important information to me and other State officials about subjects as diversed as transportation and housing, failure to obtain this information will cripple this and other State governments in carrying out important duties.

Thanks for holding hearings on this critical issue, I hope that these important questions will be restored.

Michael J. Connolly,
Massachusetts Secretary of State.

State of Montana,
Department of Commerce,
Helena, MT, August 5, 1987.

Senator John Melcher,
Hart Senate Office Building,
Washington, DC.

Dear Senator Melcher: Early this week it was brought to my attention that the Office of Management and Budget (OMB), has suggested reducing the number of questions to be included in the 1988 Census Dress Rehearsal questionnaire. Individuals who use the information normally generated by the questionnaire are extremely concerned by this action, and are worried that the reduction indicates that these questions will not be included in the 1990 Decennial Census.

Reducing the amount and kinds of information that the census has provided in the past has serious implications for economists, demographers and other data users in Montana, as well as the rest of the nation. The OMB cites several reasons for eliminating the questions, one of which is that this information is not necessary at highly localized geographic levels. By "highly localized" the OMB means all counties and metro areas with populations under approximately two million. This, of course, would eliminate Montana entirely from much of the information normally gathered by the census.

A hearing on this matter has been convened by Senator Paul Sarbanes of Maryland, for Thursday, August 6 at 9:30 a.m. in room 628 of the Dirksen Office Building. Any personal or written testimony you can offer on the state's behalf would be appreciated. The hearing is being organized by Dan Melnick of the Congressional Research Service. He can be reached at 287-8840.

Please feel free to contact me if I can supply any additional information.

Sincerely,

Keith L. Colbo,
Director.

State of Montana,
Department of Commerce,
Helena, MT, August 6, 1987.

Distribution list for materials submitted to Office of Management and Budget on the 1988 dress rehearsal Census questionnaire.

Materials telefaxed:

The Honorable Paul Sarbanes, The United States Senate, SD 332 Dirkson Senate Office Bldg., Washington, D.C. 20510.

The Honorable Ron Marlenee, The House of Representatives, Attn: Corbit Harrington, 409 Cannon House Office Building, Washington, D.C. 20515.

Materials mailed:

Wendy Gramm, Ph.D., Administrator, Office of Information and Regulatory Affairs, U.S. Office of Management and Budget, 1726 Jackson Place, Washington, D.C. 20503.

The Honorable Max Baucus, The United States Senate, SH-706 Hart Senate Office Building, Washington, D.C. 20510.

The Honorable John Melcher, The United States Senate, SH-730 Hart Senate Office Building, Washington, D.C. 20510.

The Honorable Pat Williams, The House of Representatives, 2457 Rayburn House Office Building, Washington, D.C. 20515.

Donald R. Arbuckle, Assistant Chief, Commerce and Lands Branch, Office of Information and Regulatory Affairs, U.S. Office of Management and Budget, 1726

Jackson Place, Room 3228, Washington, D.C. 20503.

Dorothy Tell, Chief, Statistical Policy Office, Office of Information and Regulatory Affairs, U.S. Office of Management and Budget, 1726 Jackson Place, Washington, D.C. 20503.

William P. Butz, Associate Director for Demographic Fields, U.S. Bureau of the Census, U.S. Department of Commerce, Washington, D.C. 20233.

Leo Schilling, Regional Director, U.S. Bureau of the Census, 101 Stewart St., Suite 500, Seattle, WA 98101-1098.

Theron A. Schnure, Chair, State Data Center Steering Committee, assistant Director, Comprehensive Planning Division, Connecticut Office of Policy and Management, 80 Washington Street, Hartford, CT 06106-4459.

Association of Public Data Users, Princeton University Computer Center, 87 Prospect Avenue, Princeton, NJ 08544.

STATE OF MONTANA,
DEPARTMENT OF REVENUE,
Helena, MT, August 5, 1987.

Hon. JAMES C. MILLER III,
Director Office of Management and Budget, Washington, D.C.

DEAR MR. MILLER: It has been brought to my attention that the OMB is proposing major changes in the questions to be included in the 1990 Census. As a significant user of Census data, I feel these changes would be unfortunate.

My Office is intimately involved in tax policy planning for the State of Montana. We provide information to policymakers that illustrates the effects of their policy options on taxpayers and state and local governments.

Census data provides the only source of valuable data in many instances. Examples of recent policy issues which relied on data that would be deleted under OMB's proposal include the creation of a homeowner property tax exemption and an income tax credit for rent paid. Census data had to be used to estimate for the revenue impacts on the various taxing jurisdictions and to illustrate the impacts on different types of taxpayers.

The OMB's proposed deletions, had they occurred in the 1980 Census, would have significantly reduced our ability to accurately estimate the impacts of these and other proposals.

I request that you reconsider your proposal. The information is used for important decisions and is not available from other sources.

Thank you for your consideration on this matter.

Sincerely,

STEVEN G. BENDER,
Chief, Research Bureau.

STATE OF MONTANA,
DEPARTMENT OF COMMERCE,
Helena, MT, August 5, 1987.

WENDY GRAMM,
Administrator, Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC.

DEAR MS. GRAMM: It is my understanding that the elimination of Questions 24a through 24d of the 1990 census is being considered.

On behalf of the Passenger Assistance Bureau of the Montana Department of Commerce, I would recommend that you not drop question 24a through 24d. The data collected by the Census Bureau in answer to that question is extremely helpful to us in assisting local communities, whether they are large or small, in meeting their public transportation needs.

Passenger Bureau staff have assisted local transportation systems in sixty-plus communities in Montana.

Staff have advised these communities in such areas as: public transportation; paratransmit; home to work program; van pooling; car pooling; and coordinating with local taxi service.

Staff have assisted communities in determining the following: number of passengers per mile; cost of passenger per mile; cost per one-way trip; cost per hour; and cost per vehicle mile.

The data collected on the census report is extremely useful to us and all transit providers in providing the cost of service.

I thank you for considering the above information before making your decision.

Sincerely,

PATRICIA SAINDON,
Chief, Passenger Bureau.

UNIVERSITY OF MONTANA,
Missoula, MT, August 4, 1987.

DONALD R. ARBUCKLE,
*Office of Management and Budget,
Washington, DC.*

DEAR MR. ARBUCKLE: I have received the proposed deletion of items from the 1988 Census Dress Rehearsal. If these items are also deleted from the 1990 Census, they will have a significant impact on our ability to provide timely and accurate information for Montana decision-makers.

We have two programs here at the Bureau that are designed to provide economic forecasts and demographic information for Montanans. *Economics Montana* provides forecasts for statewide and substate economic activity, which are widely quoted in the press and mailed (at no charge) to over 200 users. The County Data Packages provide timely updates of demographic information for all Montana counties; almost 1,000 requests have been made in the last two years. The users of both programs include state and local officials, business people, and private individuals. Similar information is available from no other sources.

Both of these programs will be directly affected by the deletion of items 14, 20, 21b, 23-24, 25-27, and 31. The 1990 values would provide both a reliable benchmark for our forecasts and parameter estimates for our models.

I strongly urge you not to delete these items.

Sincerely,

PAUL E. POLZIN,
Professor and Director of Economic Forecasting.

STATE OF MONTANA,
DEPARTMENT OF COMMERCE,
Helena, MT, August 5, 1987.

Hon. JAMES C. MILLER III,
Office of Management and Budget Director, Washington, DC

DEAR MR. MILLER: This letter is in response to your office's proposed deletion of approximately 30 questions from the questionnaire for the 1988 Census Dress Rehearsal. I strongly oppose this action. I oppose it both on general and on specific grounds.

In general it is very unwise to subvert the cerefully designed and executed process of choosing questions for the 1988 and 1990 Census questionnaries. As you may know, this process included a series of 65 public meetings held throughout the country, identification of U.S. Government needs through interagency working groups and the Federal Agency Council, along with other consultations with public and private organizations. The action by the OMB Desk Officer, Donald Arbuckle, in proposing the elimination of roughly 30 questions undermines the above described process.

The Decennial Census is the source for important and useful information that is not available elsewhere. The questions proposed for elimination are of this nature. These data are not available from alternate sources, but are vital for decisions at the state and local levels, many of which involve federal funding. The Census Bureau has ample documentation of these uses. I offer one example out of my own experience to illustrate the point.

In 1984, I produced population projections for the age group 65 and over, for each county in Montana. These projections were specifically prepared for the Montana Department of Health for use in their process of issuing certificates of need for new/expanded nursing homes. A certificate of need is required at least in part because much of the income of nursing homes comes from the Medicaid program. In order to produce county population projections for this age group, I needed historical data on migration by age. The only source for this kind of information was the 1970 and the 1980 Censuses of Population. Without this information it would have been impossible to make meaningful projections.

I strongly urge you to reverse the preliminary judgement to eliminate approximately 30 questions from the 1988 Census Dress Rehearsal Questionnaire. Thank you for your consideration in this matter.

Sincerely,

PHILLIP D. BROOKS, Ph.D.,
State Economist.

STATE OF MONTANA, DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION,
Helena, MT, August 5, 1987.

WENDY GRAMM,
Administrator, Office of Information and Regulatory Affairs, Office of Management and Budget, New Executive Office Building, Washington, DC.

DEAR MS. GRAMM: DNRC just today learned of OMB's plans to drop a number of questions from the 1988 Dress Rehearsal census questionnaire. We cannot agree with OMB's assessment that these are not necessary. DNRC needs reliable information on housing characteristics and fuel uses that is not available from sources other than the Census. In particular, we use information on the utilities and housing stock in our analyses of energy conservation potential and of utility system loads and reliability. These studies are required for DNRC and regionwide conservation program planning and for the utility facility licensing process.

We realize that OMB has proposed that some of these questions be moved to the sample. However, in a state as sparsely populated as Montana, a sample size that is adequate for national purposes is likely to be inadequate for the type of analyses we do. Therefore, we request that OMB retain the questions on utilities and housing as proposed by the Bureau of the Census.

Respectfully,

ALAN DAVIS,
Chief, Planning and Analysis Bureau, Energy Division.

STATE OF MONTANA, DEPARTMENT OF COMMERCE, LOCAL GOVERNMENT ASSISTANCE DIVISION,
Helena, MT, August 4, 1987.

Hon. JAMES C. MILLER III,
Director, Office of Management and Budget, Washington, DC.

DEAR MR. MILLER: My office works with all Montana communities on community development, economic development, community planning, and infrastructure development matters. We are dismayed to learn of OMB's proposal to eliminate useful data from the 1990 U.S. Census. Elimination of this key data will have a substantial impact on the ability of Montana communities to redevelop and reindustrialize.

For example, the proposal to eliminate information on sewer and water hookups will make it more difficult to finance community water and sewer systems. Financiers and financial consultants use the information to put together financing proposals. Without improved water and sewer facilities Montana business and industry will not be able to expand.

You have proposed to eliminate transportation data such as "the number of cars owned", "method of transportation to work", and "time to work". This information is used to develop and improve community transportation systems. It is particularly helpful in designing bus systems, light rail systems, and individual business van pooling systems.

The proposal to only make census socioeconomic data available for political jurisdictions with a population of 2 million or more indicates a lack of sensitivity to the needs of rural Americans, in general, and all Montanans in particular. Since the entire population of the State of Montana is only about 800,000, your proposal will mean none of the data will be available for any of Montana's 479 communities.

The elimination of this important data will be false economy. To cut it out at the federal level will shift the responsibility to state governments, local governments, and the private sector. Project development costs will increase. Taxes and private business costs charged the public will increase. Moreover, states, localities and businesses can not collect the information as cost effectively as the federal government. The personpower available for implementing the federal census can not be duplicated by any other governmental or private entity.

In summary, I urge OMB to reexamine the proposal to eliminate the census data cutbacks. The average citizen will lose—not benefit—from the data cutbacks.

Sincerely,

Ross McCracken,
Administrative Officer,
Community Technical
Assistance Program.

American Planning Association,
Washington, DC, August 20, 1987

Re: OMB's Proposal to Eliminate Items from the 1990 Census.

Hon. Paul S. Sarbanes,
Chairman, Joint Economic Committee, Dirksen Senate Office Building, Washington, DC.

Dear Chairman Sarbanes: This letter is being offered on behalf of the American Planning Association.

The American Planning Association is a national organization of 21,000 members, including public and private planners and elected and appointed officials at all levels of government as well as educators, students and interested citizens. Our members belong to 45 chapters covering every state and Congressional district. Many of our members use Census data on a daily basis.

APA was formed in 1978 when the American Institute of Planners, founded in 1917, and the American Society of Planning Officials, founded in 1934, consolidated. The Associations primary objective is to advance the art and science of planning for the improved development of the nation and its communities, states and regions. Within APA is the American Institute of Certified Planners which focuses on professional development. Members of AICP are distinguished by having met experience requirements and by having passed an examination on planning principles and practices.

APA is strongly opposed to the elimination of key population and housing data from the U.S. Census Bureau's 1988 dress rehearsal. We believe the proposal by the Office of Management and Budget (OMB) is shortsighted and fails to recognise the importance of Decennial Census data in decisionmaking in both the public and private sectors. Our statement, which was prepared by David J. Robertson, Housing & Human Services Planner, Dept. of Human Services and Public Safety, Metropolitan Washington Council of Governments, will focus on the policy and decisionmaking impacts of OMB's proposal.

In seeking to justify their actions, OMB suggested the deleted data did not serve important purposes or were not needed uniformly across the nation. In reality, the deleted data are essential to measure progress and develop new alternatives in many important policy areas.

OMB's decision has drawn widespread criticism from elected officials, academic institutions, community organizations and private industry. The Decennial Census is not an isolated statistical exercise, it is an ongoing policymaking tool. Census data impacts policies and programs in such diverse areas as housing, education, energy, transportation, child care, health care, and employment.

APA is particularly concerned about the impact of the proposed elimination of questions pertaining to housing. Approximately two-thirds of the 30 questions considered by OMB for elimination are directly linked to housing. The loss of these data would jeopardize the ability of both the public and private sectors to meet the still unmet challenge of a "decent home and a suitable living environment" mandated by the Housing Act of 1949.

If the OMB proposal is implemented, decisionmakers at every level will lose their most valuable tool: information.

The following four points illustrate how decisionmaking in housing programs would be affected:

(1) The Section 8 Existing Housing Certificate program represents a major housing initiative that enables lower income households to obtain affordable and decent housing. A key element of this program is the periodic publication by the U.S. Department of Housing and Urban Development (HUD) of fair market rents for communities throughout the nation. The rental data proposed for elimination would hamper the ability of HUD and local housing agencies to update this information, upon which millions of dollars in housing assistance depend.

(2) The housing affordability crisis affects many communities throughout the nation, both large and small. Federal funding for housing and community development programs has been cut by more than 70 percent since 1981 prompting many state and local governments to respond with a variety of local housing initiatives. These new initiatives, however, are jeopardized by the loss of important population, housing condition and utilization data, which are used to develop programs and monitor performance. If communities are expected to target scarce local resources, they need the comprehensive data produced by the Decennial Census.

(3) Some of the information proposed for deletion would impact on the ability to administer current Federal programs, such as the Community Development Block Grant (CDBG) program. Data on overcrowding and the condition of the housing stock would be lost under the OMB proposal, which are important measures required by HUD for CDBG allocation.

(4) New Federal legislation creating programs to aid the homeless will require each jurisdiction to adopt a Comprehensive Homeless Assistance Plan. How can local governments adequately plan to meet the housing needs of our nation's homeless if we are denied accurate data on our housing stock?

The data that the OMB is proposing to eliminate is also used for a variety of public policy decisionmaking for programs other than housing and community development:

Local governments rely on data on the source of water, public sewers and plumbing facilities to plan for adequate water supplies and wastewater treatment facilities. Private utility companies also depend on utility, fuel and other housing data to make decisions on new plant construction and utility rates, involving investments of millions of dollars. This nation cannot afford to be unprepared in the event of another energy crisis, due to a lack of data.

State and local governments rely heavily on journey-to-work data for transportation planning. Key decisions on land development and traffic impact are made using this data which few, if any, local governments would be able to collect on their own. Multimillion dollar public highway and mass transit projects, along with private investment, hinge on the transportation data proposed for elimination.

Funds allocated under the Job Training Partnership Act are largely based on labor force data also proposed for elimination. The effectiveness of local programs to train and employ unemployed workers would be jeopardized under the OMB plan.

In offering this proposal, the OMB suggested that data may not be needed at a national level, or that data may be more appropriately collected by a smaller sample, or in a more specific geographic area. APA views this approach as unwise and inefficient. Although the solutions to our nation's and communities' problems may require different approaches, the basic information needed to make those evaluations is the same. Local communities, particularly rural areas, may not have adequate resources to collect and analyze locally collected data. It is simply not cost effective to require thousands of communities to collect individually the same data collected by the Decennial Census on a national level.

Not only is OMB's decision ill-founded, but their process in reaching this decision has been unfair. OMB has chaired the Federal Agency Council for the 1990 Census since 1984 and has been involved in the preparation and review of proposed questions since that date. During all these months of deliberation between OMB, the Bureau of the Census, Federal agencies and data users, OMB failed to express any concern about the application of the Paperwork Reduction Act. Only on July 24, 1987, just before the Congressional recess, and with only two months for public comment, did OMB indicate its intention to eliminate key housing and other demographic data, citing their responsibility under the Paperwork Reduction Act. Although time remaining before the 1990 Census is growing short, it is imperative that the views of local communities, data users, and other concerned with the Census be heard before an irreversible decision is made.

Rather than attempt to alter the 1988 dress rehearsal at this late date, OMB should rely on the judgment of Census officials and staff. The 1988 dress rehearsal is the product of some of the most noted demographic and statistical experts in the nation, and reflects the input of data users in both the public and private sectors. OMB should respect the professional expertise that developed the 1988 Census dress rehearsal.

APA does not view the Decennial Census as just another government program. The Census was one of the first acts of our newly formed republic in 1790 and has enjoyed the support of the American people for almost 200 years. The American people respect the Census and comply because they understand the value of information in a democratic society. Census data enable government, industry, and private citizens to better understand our past, view our present, and to plan for our future. The time that it takes for respondents to complete the Census questionnaire is a wise investment that will enable the nation to plan for our needs as we approach the 21st century.

Senator Sarbanes, the American Planning Association is most appreciative of your conscientious inquiry into this important subject and your Committee and its staff are to be commended for holding this hearing on such short notice prior to the Congressional recess.

We hope that Congress and the Joint Economic Committee will do all within their power to see that the proposal by OMB to eliminate so many necessary items from the 1990 Census is not implemented.

Thank you for the opportunity to express the views of the American Planning Association on this subject. We would be delighted to assist the Committee to see that the Census is restored to being a compilation of data that is truly useful for public and private decisionmaking.

Sincerely,

LINDA E. HOLLIS, AICP,
Chair, National/State Policy Coordinating Committee.

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NINA SYDNEY LADOF, DIRECTOR

August 26, 1987

Senator Paul Sarbanes
Room 332
Dirksen Senate Office Building
Washington, D.C. 20515

Dear Senator Sarbanes,

I read with dismay of the Office of Management and Budget's proposal to cut one-third of the questions on the 1990 census. The topics involved, including housing, transportation and employment are among those areas frequently requested by library users for business planning, proposal writing for non-profit agencies, and school assignments among other uses.

I urge the support for the Dress Rehearsal Questionnaire as proposed by the Bureau of the Census and the opposition of the OMB's proposed deletions.

Sincerely,

Karen R. Avenick

Karen R. Avenick
Supervisor, Reference Services

KRA/he

CC: Paul Manchester✓
American Library Association, Washington Office

88-42 GOV

CRS REPORT FOR CONGRESS

CENSUS QUESTIONS AND OMB'S REVIEW OF THE CENSUS BUREAU PROPOSAL: A SUMMARY AND BRIEF ANALYSIS

Daniel Melnick
Specialist in American National Government
Government Division

and

Alexander Lurie
Senior Research Assistant
Government Division

Revised April 12, 1988

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ABSTRACT

This updated report of CRS Reports 87-812 GOV and 88-42 GOV reviews recent developments regarding the content and procedures for the 1990 Census including OMB's scrutiny of the need for information for various subjects.

SUMMARY

By law, the Office of Management and Budget (OMB) is required to approve every form used by the Federal Government to collect information from the public. Under this authority it reviews proposed census questionnaires.

The decennial census is the largest single survey conducted by the Federal Government. As such, its questionnaire receives the highest level of consideration and scrutiny, including extensive field testing and consultation with Federal agencies, States and local governments and the public as well as Congress. In the past, the final test [known as the Dress Rehearsal] has been an operational dry run incorporating all features of the questionnaire and procedures used in the actual census. Only marginal subsequent adjustments are envisioned as being necessary after the Dress Rehearsal.

On September 16, 1987, OMB announced that it had decided to reject the Census Bureau's 1988 proposed Dress Rehearsal questionnaire. At the same time, OMB asked the Bureau to modify its request and return it for expeditious handling.

Specifically OMB asked the Bureau to:

-- move most of the housing questions to the sample form;

-- reduce the number of households that receive the long form from 16 million to 10 million by adopting a variable sampling rate; and

-- eliminate three housing questions related to utilities from the form.

On October 28, 1987 OMB approved the Census Bureau's modified Dress Rehearsal questionnaire that complied with all of OMB's objections except for a compromise on one of the utility questions.

Then on March 29, 1988, after negotiation between OMB and the Census Bureau, the two agencies reached agreement on the content and sampling design of the 1990 questionnaire.

The agreement included the following:

-- a total sample of 17.7 million households;

-- the return of two housing questions from the sample to the 100% form;

-- the restoration to the sample form of previously deleted questions on the cost of utilities;

-- the inclusion on the sample form of questions on plumbing, telephone, and congregate housing.

This report summarizes the events leading up to this agreement and its possible implications.

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CENSUS QUESTIONS AND OMB'S REVIEW OF THE CENSUS BUREAU PROPOSAL: A SUMMARY AND BRIEF ANALYSIS

BACKGROUND OF THE DISPUTE

On June 17, 1987, under the terms of the Paperwork Reduction Act, the Census Bureau sent OMB its proposal for the questionnaire to be used during the 1988 Dress Rehearsal for the 1990 census. Customarily, whatever questionnaire is used for it contains most of the questions to be used for the 1990 census.

The Bureau's proposal was the culmination of a review process that began in 1983 [see Appendix 1: The 1990 Census Chronology] and involved consultation with Federal agencies, including OMB, and the public.

On July 24, 1987, OMB informed the Census Bureau that it was concerned about the justification for a substantial number of questions. This expression of concern had a timing consequence because to meet the Dress Rehearsal schedule the questionnaire had to be sent to the printer by October 16, 1987; but, OMB approval was required before this could occur.

In July, OMB questioned the need for including about 60 percent of the housing subjects. It asked why all but one of those it was willing to approve could not be placed on the sample form. OMB also questioned the need for collecting information about unemployment, commuting, fertility and mobility.

Proponents of these items cited the losses that would result from eliminating them. For example, they argued that if unemployment data were not collected on the decennial, BLS would not be able to report the local area unemployment rates for many areas smaller than counties.

Proponents of the housing items said that they are widely used by the housing industry and also form the basis of other statistical series. For example, they are used to select samples employed to determine the Consumer Price Index, which is a key indicator used to increase or decrease some Government benefits and some salaries in the private sector.

RELATIONSHIP BETWEEN THE DRESS REHEARSAL AND THE CENSUS

Shortly after being informed that OMB was questioning a large number of subjects, the Census Bureau issued a statement in which it said that although the review concerned the Dress Rehearsal questionnaire, "[b]oth the OMB and Census Bureau regard [its] content . . . as a preview" of the questions to be used in 1990. "Therefore, the questionnaire changes proposed by OMB . . . would apply to the 1990 census as well."

While there have been exceptions in the past [most notably, the addition of the Hispanic identification question to the 1970 census], historically, the questions appearing on the census questionnaire have been included in the Dress Rehearsal. The questionnaire to be used in the 1990 census will be printed during the fall of 1989, but minor changes up to the spring of 1989 are possible. However, other preparations [including computer programming for the tabulations] began December 1987 making changes increasingly problematic after then.

On December 22, 1987, Representatives Dymally, Roybal, Matsui, Garcia, Mfume, and Bonker wrote to the Director of OMB that they were "concerned about the potential impact of changes on the census". They asked OMB "not to close the door on the final plans for the 1990 census sampling and questionnaire until Congress has had a chance to review" the report required to be filed by the Census Bureau on April 1, 1988.

AUTHORITY FOR OMB'S PROPOSED ACTIONS

OMB's authority to review census questionnaires is long standing. It can be traced to the Bureau of Efficiency in the 1920's and was first incorporated into law in the Federal Reports Act of 1942. It is currently contained in the Paperwork Reduction Act of 1980, which was reauthorized as a part of the Continuing Appropriations Resolutions enacted October 18 and 30, 1986 (P.L. 99-500 and P.L. 99-591; 100 Stat. 3341--p. 335 et seq.). Under this Act, agencies which use questionnaires to request information from the public are required to obtain prior approval from OMB. This requirement is administered by OMB's Office of Information and Regulatory Affairs [OIRA.]

In support of its actions, OMB officials contended that the Paperwork Reduction Act provides a congressional mandate to reduce the public's burden in responding to the census and that in order to fulfill this mandate, OIRA is required to consider reducing the number of questions on the census form. They further contended that the lower than expected public response to the mail census during pre-tests indicated that the form is too long and cumbersome.

CONGRESSIONAL REVIEW OF CENSUS QUESTIONNAIRE

Additionally, the Census questionnaire is subject to the congressional review procedures contained in Title 13 of the U.S. Code. Under 13 USC 141, the Secretary of Commerce is required to inform Congress about the proposed subjects to be included on the census form by April 1, 1987 and the proposed questions by April 1, 1988. The first report relating to the subjects was filed with both the House Census Subcommittee and the Senate Federal Services Subcommittee on March 27, 1987. These subcommittees held a joint hearing on May 14, 1987, which was followed by an additional House hearing on May 19, 1987.

At these hearings the Census Bureau was asked to explain the reasons for including each subject on the census questionnaire. Of interest, in terms of subsequent OMB concerns about housing questions on the census form, is that the subcommittees invited the Department of Housing and Urban Development to testify on the housing items, but it declined.

OMB REVIEW OF THE DRESS REHEARSAL QUESTIONNAIRE AND PUBLIC AND CONGRESSIONAL REACTION TO OMB'S CONCERNS

The Bureau submitted its proposal for the Dress Rehearsal questionnaire on June 17, 1987. OMB raised concerns about approving the form on July 24, 1987.

On August 7, 1987, the Joint Economic Committee (JEC) held a hearing to review the implications of OMB's possible actions. At that hearing, Dr. Wendy Gramm, Administrator of the OMB's Office of Information and Regulatory Affairs, was closely questioned about OMB's concerns about the census questionnaire. Dr. Gramm replied that OMB had not made any final determination about the questionnaire but was carefully considering various courses of action including altering the questionnaire and changing the sampling plan.

Subsequent to the hearing, OMB received more than 600 letters relating to the proposed changes. On August 25, 1987, it issued a notice in the Federal Register setting forth the grounds that it would use to make its decision. OMB said it was considering the need for including a wide range of subjects on the decennial census. It asked if users knew of alternative available information that was either more accurate than census data or could be used as a substitute. It raised the possibility that users could be satisfied if an alternative and reduced sampling scheme were used to collect most of the information originally planned for the census. As well, it reported OMB was considering using an alternative sample or moving items from the 100% form to the sample. It stressed the requirement to reduce the public's burden in responding to the census form.[1]

On February 24, 1988, the House Select Committee on Aging held a hearing to review the final OMB approved dress-rehearsal questionnaire. Representative Roybal, in announcing the hearing, stated that "proposed changes to the 1990 Census threaten to cripple the ability of local officials, planners, administrators, and businesses to plan for the housing needs of small population groups such as the elderly, the poor, minorities, the disabled, and the farm population through out the next decade." In response, Joseph Wright, Deputy Director of OMB testified that the changes in content and sample size would reduce the response burden on the public without diminishing data quality. He also acknowledged that OMB's proposal was not based on cost considerations. Finally, he noted "that no final decisions will be made regarding the 1990 census forms and sample design until the results of the 1988 Dress Rehearsal have been studied and discussed by all parties that have a stake in the census."

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[1] Review of the "Dress Rehearsal" for the 1990 Census of Population and Housing; Notice. Federal Register, Part IV, August 25, 1987: 32114-32118.

IMPLICATIONS OF OMB'S PROPOSED ACTIONS

On September 16, 1987, OMB sent a letter to the Department of Commerce in which it detailed the steps the Census Bureau would be required to take before approval could be granted.

Questions Eliminated

Generally OMB pulled back from any plan to cut large numbers of subjects from the census form. Instead, it made marginal changes in the content but emphasized reductions both in the short form and the number of people who receive the long form. OMB's actions can be seen as a response to the public reaction following the JEC hearing in August.

In an attempt at blunting any further criticism, the Commerce Department's reply to OMB's letter said, "The public will have ample opportunity to comment on changes you have directed in content before we submit a final questionnaire to Congress on April 1, 1988."

This is of interest because it differed from the position taken by the Census Bureau and OMB in July when they said that very few changes could be made after the Dress Rehearsal.

The three questions that were slated for elimination related to energy use and cost. The most important of these concerned the cost of utilities. Inclusion of utilities questions was justified as necessary in order to calculate total housing costs. Elimination would make it more difficult to ascertain regional variation based on differences in weather. The Department of Housing and Urban Development appealed to OMB for inclusion of this item because it believed that elimination would have made it difficult to produce accurate estimates of fair market rents, as required by the Federal Housing Act of 1937, as amended.

Sample Changes

OMB's instructions left the sample design to the Census Bureau but proposed to limit the total sample to 10 million households rather than the 16 million proposed by the Bureau. It also proposed that no jurisdiction or census tract have a sampling rate of greater than 50% and that sampling rates be lower in high density population areas to improve efficiency. Census Bureau analysis determined that use of the following sample rates in the 1988 Dress Rehearsal would comply with OMB guidelines: a sample rate of 1 out of 2 housing units (HUs--a house, apartment, group of rooms, or a single room occupied as a separate living quarter or, if vacant, usable as a living quarter) in governmental units (GUs--any incorporated place that has previously received some type of revenue sharing) with fewer than 1,000 inhabitants; 1 in 6 for GUs having populations between 1,000 and 2,500 and for census tracts and block numbering areas (BNAs--zones that are specified for the purpose of grouping blocks where census tracts have not been defined) with between 1 and 1,000 HUs; 1 in 10 for census tracts and BNAs with between 1,000 and 2,500 HUs; and, 1 in 20 for census tracts and BNAs with 2,500 or more HUs.

However, Census Bureau officials argued that data quality would suffer under OMB's restrictions, particularly for minority groups. On December 10, 1987, the Bureau issued a proposal for the 1990 Census calling for an overall 1 in 6 sample, with sample rates of 2 in 3 for GUs with fewer than 1,000 persons, 1 in 3 for GUs having between 1,000 and 2,500 persons and for census tracts and BNAs with fewer than 1,000 HUs, 1 in 6 for census tracts and BNAs having between 1,000 and 2,500 HUs, 1 in 10 for census tracts and BNAs between 2,500 and 3,500 HUs, and 1 in 12 for census tracts and BNAs with 3,500 or more HUs.

Those interested in data for rural areas welcomed the increased sample for them, but city officials were concerned that the new sampling procedure would provide them with less information. OMB had contended that the reduced central city sample would free resources needed to improve the accuracy of the central city population count.

One problem in limiting the sample size would be the difficulty of providing data that coincide with census tracts. For example, it would be more difficult to tabulate the number of children in poverty (by school districts) as required by the Elementary and Secondary Education Act.

Opponents also contended that operational considerations would make the proposed OMB procedures difficult to implement. They said that if local census offices were required to manage several sampling rates, it would add confusion to an already complicated process.

Moving Items from the 100 Percent Census to the Sample

By moving items from the form received by all of the households to those received by a sample, the Administration would have reduced the detailed data that was available. This would have limited the statistics available about:

-- small towns, rural areas, city neighborhoods, and voting precincts; as well as

-- small groups in the population--such as families in Baltimore headed by Hispanic women with five children.

For example, because the rent questions would have been on the sample form, it would be harder to estimate the rent paid by households in small areas and rare groups according to the size of their living quarters.

THE FINAL OMB APPROVED DRESS REHEARSAL QUESTIONNAIRE

The final Dress Rehearsal questionnaire reflected almost all of OMB's objections to the Census Bureau's proposal. First, the Bureau shifted all questions in point from the 100 percent census to the sample. Second, the Bureau used OMB's request of a 1 in 10 (total sample of 10 million) as the variable sample as opposed to a 1 in 6 (total sample of 16 million) variable sample.[2] Finally, the Bureau eliminated all three utility questions except a question on whether or not utilities are included in the rent, which was added to the rent question on the sample.

THE FINAL OMB APPROVED 1990 DECENNIAL CENSUS QUESTIONNAIRE

After OMB's approval of the Dress Rehearsal questionnaire, numerous interested parties including the Housing Statistics Users Group, the Census Bureau, and several Members of Congress sought to reverse OMB's changes and restore the deleted questions and sampling procedures to the actual 1990 census questionnaire. Congressional concerns were initially expressed in the February 24, 1988, hearing before the House Select Committee on Aging. Then on March 15, 1988, the Chairman of the Joint Economic Committee Senator Paul Sarbanes sent a letter to President Reagan expressing concern over OMB's proposed changes to the 1990 questionnaire. This letter was signed by a total of 30 Senators and Representatives from both political parties. The letter stated:

---

[2] Yet the Census Bureau continued to argue for the 1 in 6 sample for the 1990 Census. In a report sent to Dorothy Tella, Chief Statistician of the Office of Management and Budget, on December 10, 1987, the Census Bureau outlined a series of arguments on why census data quality would suffer from the OMB requested 1 in 10 sample for the 1990 Census.

> There is deep and widespread concern among state and local officials and housing statistics users in the private sector that the truncated questionnaire will result in more limited and less accurate data, with important adverse implications for public and private-sector decisionmaking over the coming decade.

Subsequently, OMB and the Census Bureau reached a compromise on March 29, 1988. This agreement yielded a consolidated Administration position on the 1990 Census content and sample. The settlement included the following:

1) The 1990 sample size for the long form will be 17.7 million households or a 1 out of 6 variable sampling rate.

2) Questions on the number of rooms in a housing unit and the value of the home or monthly rent will be restored to the 100% short form.

3) Questions on fuels and the cost of utilities will be returned to the long (sample) form.

4) Questions on plumbing, telephone, and congregate housing will remain on the long form. The remaining questions on the Dress Rehearsal will be on the short questionnaire.

DETAILED ANALYSIS OF IMPACT ON THE CENSUS QUESTIONNAIRE

A detailed list of the subjects originally considered for inclusion on the Census questionnaire together with a review of the impact of the OMB action appear below. Beginning with the items included in the Census Bureau's proposal of April 1, 1987, the list shows those that will be unchanged, moved, restored or eliminated in response to OMB's views and subsequent negotiations.

The Bureau's Proposal

A. **100% population questions are asked about each person included in every household in the Nation as well as persons not living in households. Six subjects are proposed in this category. All of these were included in the 1980 census:**

1. **Name:** The name of each person will be included on the form but generally not captured in the computerized record. The main purpose of this item is to help keep track of who is being included in the household. It also makes it possible to check the count during follow-up activities and the evaluation. NOT CHANGED

2. **Household relationship:** Respondents are asked to provide the relationship between the first person listed (generally themselves) and the other people living in the household. This information is used to keep track of the people being counted and is also the basis for analyses that show the condition of families. Because the census form includes all of the people living in a household--even if they are not related--this item is the only way of providing information about families. NOT CHANGED

3. **Sex:** This item is also considered to be an important part of the identity of persons. It is used in many census analyses. NOT CHANGED

4. **Race:** The Bureau largely relies upon respondents to identify their race (including white, black, American Indian and several Asian nationalities) and those of the persons living in the household. Enumerators are instructed to accept the information as provided by respondents. This item is used in the enforcement of civil rights laws. For example, the number of persons in the labor force who are members of different race groups is an important factor in establishing goals for affirmative action. When the States draw district lines for congressional and State legislative seats, they must take race into account to be sure that they do not violate provisions of the Voting Rights Act. Information about the economic and social progress of persons who are members of different racial groups is closely watched by various interests. This information is also used in evaluating the census. NOT CHANGED

5. **Age:** Age is also one of the factors used in determining the completeness of the count. It is vital for tracing the differences between young and old people and is used, for example, in projections of the resources required for the social security system. NOT CHANGED

6. **Marital status:** The respondent is asked if (s)he is married, separated, divorced, widowed or never married. In 1980, the census only recognized marriages that occurred after age 15. During the editing of the returns anyone under age 15 who indicated a marital status other than "never married" was changed to "never married." NOT CHANGED

7. **Hispanic origin:** The Spanish Census Act (PL 94-311) provided a congressional mandate for the collection of this information. It is used for affirmative action and civil rights enforcement. NOT CHANGED

B. **100% housing questions** are asked about each housing unit and household in the Nation. Eight subjects are proposed in this category. Two of them are new [the rest were included in the 1980 census].

1. **Number of units in structure:** Respondents are asked to report the number of housing units in the building. This subject provides information about the density of housing. It is used by local governments in determining and monitoring zoning regulations. It is also important in assessing the need for mass transit and roads. NOT CHANGED

2. **Number of rooms in the unit:** In combination with the number of persons in the housing unit, this subject provides information about overcrowding which is defined as a housing unit with more than one person per room. The extent of crowding is a measure of the need for housing and is used in the allocation of funds for housing. SHIFTED TO SAMPLE; THEN RETURNED TO THE 100% FORM

3. **Tenure:** Respondents are asked to indicate if they own or rent their residence and whether it is a part of a condominium. This information is used in the analysis of the housing market to separate the owners, renters, and types of owned housing. It is important in designing the sampling plan for the survey that results in the Consumer Price Index (CPI) because the cost of rent is a major part of the CPI. According to the Bureau of Labor Statistics, indexing provisions built into various provisions of Federal law mean that a change of 1 percent in the CPI has a $4.6 billion impact on the Federal budget. These data are also used in setting housing costs for members of the armed forces. CONDOMINIUM STATUS SHIFTED TO THE SAMPLE

4. **Value of the home or monthly rent:** Provides detailed data about the relationship of what people spend for rent or mortgage payments and their income and other characteristics. Used to set the amounts of money people receive as rent subsidies under HUD's fair market rent program. SHIFTED TO THE SAMPLE, A QUESTION ON UTILITY PAYMENTS ADDED,; THEN RETURNED TO THE 100% FORM

5. **Vacancy characteristics:** The follow-up enumerators of the Census Bureau will compile information about vacant housing. This information helps account for housing and is a part of efforts to count each person. The item is also used to identify places where there is a surplus and shortage of housing. HUD uses it to plan and implement Federal programs that aid housing. For example, FHA considers the prevailing vacancy rate when it

decides whether to participate in loans to builders. NOT CHANGED

6. **Plumbing:** Respondents are asked whether their housing unit has indoor plumbing. This is regarded as a measure of housing quality. Lack of indoor plumbing indicates sub-standard and unhealthy housing conditions. In 1980, about 2.5 percent of the Nation's housing did not have plumbing. However, these units were not evenly distributed over the Nation but concentrated in certain localities. For example, the last census found that in 11 percent of all U.S. counties 10 percent or more of their housing lacked plumbing. This subject can be used to highlight neighborhoods where housing is a problem. SHIFTED TO THE SAMPLE

7. **Telephone:** Including this question saves money in the follow-up of the census because it makes it possible for the Bureau to use the phone to call people rather than send out an enumerator. While the Bureau will report on the number of housing units that have telephones, the telephone number will not be recorded in the Bureau's computer's. PRESENCE OF A TELEPHONE WILL BE SHIFTED TO THE SAMPLE, BUT THE TELEPHONE NUMBER FOR FOLLOW-UP WILL BE REQUESTED FROM EACH HOUSEHOLD BUT NOT RECORDED AS A DATA ITEM.

8. **Congregate housing:** Respondents will be asked to indicate if their rent includes meals. In the National Content Test less than 1 percent answered yes to this item. However, the Bureau may argue that without this subject, its rent statistics would be inflated. SHIFTED TO THE SAMPLE; THEN RETURNED TO THE 100% FORM

C. **Sample population questions** are asked about every person living in households selected for the sample (about 20 percent of the households) as well as a sample of the persons who do not live in households. Ten subjects are proposed for inclusion in 1990.

1. **Education-enrollment and attainment:** The enrollment question provides detailed information on the number and characteristics of young persons who are attending and have dropped out of school. Attainment shows the number of years of schooling that each person has completed. This information is used by private companies in deciding where to locate plants and other employment centers as well as in their marketing strategy. NOT CHANGED

2. **Place of birth, citizenship, year of entry:** This information is used wherever policies require information about citizenship and the number of aliens. It is used in planning immigration policies. It is also used in studies of the pool of persons who are eligible to vote in elections. NOT CHANGED

3. **Ancestry:** This question was added in 1980 to provide information about groups not covered by the race and Spanish

origin questions on the 100% form. It could be used by any group that wants to assert a need for special consideration under the equal opportunity laws. NOT CHANGED

4. **Language spoken at home:** Identifies the population that has a difficult time with the English language. It could be used to identify those persons who require foreign language assistance in voting or other matters as well as to analyze the need for special education programs that are aimed at people who do not speak English. NOT CHANGED

5. **Migration:** Basic indicator of population movement. Used as a basis for checking the Bureau's estimates of population between the census and to understand the reasons for movements and also to assist in predicting future growth. The information might also be used to construct samples of people who have moved in the last five (5) years. For example, anyone wanting to estimate the number of farmers who have left family farming in the last five years might start with the responses to this question. NOT CHANGED

6. **Disability:** Respondents are asked to identify individuals who cannot work or travel because of disabilities. It is used to estimate the number of people who could benefit from special programs regarding rehabilitation services, vocational education and anti-discrimination activities. Veterans Administration uses it to determine where to locate medical facilities for veterans. NOT CHANGED

7. **Fertility:** Each women is asked to indicate the number of children she has borne. This item describes the child bearing characteristics of the population. It provides a profile of the levels of fertility of different groups in the greatest degree of detail and insight on population growth differentials among groups. NOT CHANGED

8. **Veteran status:** This item counts the number of persons who have served in the active armed forces or national guard. The Veterans Administration uses the data as a base line for the veteran population projections for planning purposes. For example, it is used to help plan where to put hospitals and other medical facilities as well as outreach and employment programs for veterans. NOT CHANGED

9. **Employment and unemployment:** Provides geographic detail for information that is regularly collected on the Current Population Survey. This information is used by BLS as a part of estimates of employment and unemployment for areas that are smaller than an entire labor market. Where other currently collected information is not available BLS uses the census data together with other information to provide the best possible estimates for some areas. For example, Cook County, Ill. is disaggregated from Chicago using various sources including

decennial census data. This subject also provides detail for very rare groups. The Department of Labor and Commerce use the resulting estimates to allocate funds under the Job Training Partnership Act. NOT CHANGED

10. **Occupation, industry and class of worker:** This information describes the work done by persons. It is used to evaluate the work force. For example, in analyses of affirmative action it is used to determine the supply of persons in different occupational groups. It is used to project the supply of persons in highly skilled occupations. State and local governments use it to determine the need for vocational education. NOT CHANGED

11. **Place of work and commuting:** These are the bench mark data for local transportation planning. Data are used to identify the need for mass transit and roads and are used for determining the number of passengers likely to use those facilities. Respondents are asked where each person living in the household works, how each gets there and what time each leaves for work. Used to identify transportation problems that need to be solved. FEMA uses the information summarized at the work place to plan for the evacuation of the day time population if this was ever necessary. These data are also used as a part of the identification of metropolitan areas and labor market areas. NOT CHANGED

12. **Income in 1989 and work experience:** For this subject the Bureau collects various sources of money income. This subject is the basis for statements about the number of people living below the poverty line. Various programs (such as Title 1 of the Elementary and Secondary Education Act) require its use in funds allocation. NOT CHANGED

D. **Sample housing questions** are asked about the households and housing units that are included in the sample. Ten subjects are proposed for inclusion in 1990.

1. **Heating equipment and fuels:** Used to calculate the amount of energy used by households and assess the need for and planning for energy assistance allocations. It is also used in anticipating the future requirements of the Nation for energy and tracking where these requirements are greatest. **THREE OF FOUR QUESTIONS DELETED. THE QUESTIONS ON FUELS WERE RETURNED TO THE SAMPLE. QUESTIONS ON HEATING EQUIPMENT WERE DELETED.**

2. **Source of water and method of sewage disposal:** Identifies areas that have housing that may be hazardous to the safety of the occupants. Identifies places where new housing could not be built until emplacement of a water system. NOT CHANGED

3. **Autos, light trucks and vans:** Used in transportation policy planning. Department of Transportation uses it to determine the likely amount of traffic generated by a household. This is a part of its calculation of the need for highways. NOT CHANGED

4. **Kitchen facilities:** If a kitchen is not included in the housing unit, that unit is less suitable for low-income occupancy. This subject makes it possible to characterize areas with regard to the housing quality. NOT CHANGED

5. **Year structure built:** This question relates to housing quality and for some Federal grant programs. Data gathered are informative about housing related infrastructure (such as water and sewer lines that may have been put in a long time ago). NOT CHANGED

6. **Year moved into residence:** This makes it possible to characterize neighborhoods with regard to their stability. Newly developed areas can be identified as well as older changing ones. NOT CHANGED

7. **Number of bedrooms:** The average rents charged for housing units in different areas are classified by the number of bedrooms. This is used to establish fair market rent prices. Data are used with regard to rent subsidies for low-income families. NOT CHANGED

8. **Farm residence:** Data identify farm households. This subject allows the Census Bureau to prepare extensive analyses of the characteristics of people who live on farms. NOT CHANGED

9. **Housing quality:** A new subject for 1990, that would measure housing quality by asking if there are holes in the floor and how many times the heating equipment broke down during the past year. DELETED PRIOR TO SUBMISSION TO OMB OF DRESS REHEARSAL PROPOSAL

10. **Shelter costs including utilities:** These ask questions for total out-of-pocket expense for housing as opposed to just the mortgage payment or rent. This makes it possible to estimate the percent of income that is spent on housing. FHA and VA as well as mortgage lenders examine these data when they set standards for mortgage eligibility. UTILITIES' PORTION ELIMINATED; THEN RETURNED TO THE SAMPLE

APPENDIX 1: THE 1990 CENSUS: A CHRONOLOGY

APPENDIX 1: THE 1990 CENSUS: A CHRONOLOGY

Date	Activity
Apr. 1, 1980	Census Day 1980.
Dec. 31, 1980	Census Bureau reported apportionment results from the 1980 census.
Apr. 1, 1981	Figures reported to State legislatures for redistricting purposes.
1981-1985	Reports of the results from the 1980 census issued by the Census Bureau.
1982-1985	Census Bureau staff evaluated the results of the 1980 census to help decide on improvements needed for the 1990 census.
1983	Census Bureau assembled core staff to begin working on the 1990 census plan.
1984-1985	Census Bureau conducted 65 public meetings in every State and the District of Columbia to obtain suggestions and advise regarding the questions that should be included on the census form.
1984-1985	The Census Bureau conducted pre-tests in Jersey City, New Jersey and Tampa, Florida in the spring of 1985. **OMB approved the forms on September 28, 1984 and did not raise objections to the items.**
1984-1985	The Census Bureau organized 10 Federal interagency working groups consisting of expert representatives from Federal agencies. These groups reviewed the subjects and made recommendations as to questions that should be incorporated. Subjects covered were: housing, general demographics, race and ethnicity, American Indians and Alaskan Natives, the institutional population, education, health and disability, transportation, labor force and occupation, and income and poverty. **The Bureau's proposed questionnaire reflects the views of these working groups. Contrary to the practice since 1940, OMB refrained from participating in these detailed discussions.**
Nov. 1984	**OMB convened a Federal Agency Council on the 1980 census** consisting of policy officials who reportedly took a broader view of census issues and did not consider the specific justifications for items. This body has not yet issued a report.

APPENDIX 1: THE 1990 CENSUS: A CHRONOLOGY--Continued

Date	Activity
1985-1986	Census Bureau conducted the National Content Test, a sample survey test of the items it was considering including on the census form. **OMB reviewed this form and approved it for use on September 30, 1985.** The test occurred during the spring of 1986. Results were reported to OMB in January 1987.
1985-1986	The Census Bureau conducted pre-tests in Meridian Mississippi and Los Angeles, California during the spring of 1986. **OMB reviewed the questionnaires for these tests and approved them on August, 16 1985.**
1987	Pre-test held in North Dakota.
Apr. 1, 1987	Census Bureau reported to Congress on the subjects to be included in the 1990 census questionnaire. Their report indicated that they would include all of the subjects that were included in their proposed Dress Rehearsal questionnaire. **OMB approved the report to Congress.**
May 14, 1987	The House Census Subcommittee and the Senate Federal Services Subcommittee held joint hearings to review the census content. **Dr. Gramm testified; said OMB would carefully review the Dress Rehearsal questionnaire but did not give any indication of what position OMB/OIRA might take.**
June 16, 1987	**Census Bureau submitted the Dress Rehearsal questionnaire to OMB for approval.**
July 1987	Office for the Dress Rehearsal opened in St Louis, Missouri.
July 24, 1987	**OMB raised questions about the need for 30% of the subjects on the questionnaire.**
Aug. 7, 1987	The Joint Economic Committee held a hearing to review the implications of OMB's possible actions.
Aug. 7, 1987	**Deadline for the Census Bureau to respond to the OMB proposal for cuts in the questionnaire.**
Sept. 15, 1987	**Public comments on the proposed action required by this date.**

APPENDIX 1: THE 1990 CENSUS: A CHRONOLOGY--Continued

Date	Activity
Sept. 15, 1987	OMB rejected the Census Bureau's proposed questionnaire for the Dress Rehearsal and required that they drop three questions, move others from the 100% census to the sample form and reduce the size of the sample from 16 million to 10 million respondents.
Sept. 22, 1987	The Census Bureau submitted a revised proposal for the 1988 Dress Rehearsal questionnaire that reflected all of OMB's objections except for a compromise on a question on utilities.
Oct. 28, 1987	OMB approved the modified 1988 Dress Rehearsal form as required by the Paperwork Reduction Act.
Dec. 10, 1987	The Census Bureau sent an issue paper to OMB advocating the use of a 1 in 6 sample for the long form in the 1990 Census to improve census data quality.
Dec. 1987	Census Bureau staff beginning preparations for the tabulation and publication of the reports from the 1990 Census. This work will proceed on the assumption that no further changes will be made in the subjects included on the 100% and sample questionnaires.
Jan. 1988	President's FY89 budget request contained a request for funds for the bulk of the preparations for the 1990 census.
Feb. 24, 1988	The House Select Committee on Aging held a hearing on the final OMB approved Dress Rehearsal questionnaire.
Mar. 15, 1988	Senator Sarbanes, Chairman of the Joint Economic Committee, wrote a letter to President Reagan expressing concern over OMB's proposed changes to the final 1990 questionnaire and urged restoration of the Census Bureau's proposal on content and sampling design. The letter was signed by 30 Senators and Representatives from both parties.
Mar. 20, 1988	Dress Rehearsal census day [conducted in St. Louis, Missouri].
Mar. 29, 1988	OMB and the Census Bureau reached a compromise on the content and sampling design for the 1990 census questionnaire.
Apr. 1, 1988	Census Bureau reported to Congress on the exact wording of 1990 census questionnaire.

APPENDIX 1: THE 1990 CENSUS: A CHRONOLOGY--Continued

Date	Activity
May 1988	Pre-list, the first operation required for the decennial census begins.
June 1988	Census Bureau deadline for submitting 1990 Questionnaire to OMB for formal clearance.
Oct. 1988	Bids begin for the printing of the 1990 Questionnaire.
Jan. 1989	President's FY90 budget request contains most of the funds needed for the operations of the 1990 census.
Mar.-Apr. 1989	First local census offices open for checking address lists.
Spring and Summer, 1989	Congressional consideration of the Appropriations request for the preparations for the 1990 census.
Fall 1989	Most census district offices open and begin work.
Sept. 1989	OMB clearance of the final census forms required by this date.
Oct. 1989	Label tapes submitted to vendors for the printing, labeling, and assembly of the mailing packages. Questionnaires are printed at that time.
Nov. 1989	Pre-census local review.
Jan. 1990	Census Bureau reviews and re-canvases areas where local review has discovered possible problems.
Mar. 23, 1990	Census questionnaires delivered to householders.
Apr. 1, 1990	Census Day.
Apr. 2, 1990	Start capturing data for the computer.
Apr. 26, 1990	Beginning of follow-up operations.
June 28, 1990	Start of field follow-up to fill in information not provided in the public's mailed responses.
Dec. 31, 1990	Census Bureau transmits population count by State and new apportionment of the House of Representatives.

APPENDIX 1: THE 1990 CENSUS: A CHRONOLOGY--Continued

Date	Activity
Apr. 1, 1991	Census Bureau required to provide the States with detailed returns including block level counts by race and Hispanic origin for use in designating new Congressional and State Legislative Districts.
July 1, 1991	Reference date of the first intercensal population estimates required to be produced under 13 USC 181.
1991-1993	Census Bureau will issue reports on the results of the content of the census.
1992	Most data from the census is available for use by statisticians working for State and local governments
1993	New statistical procedures are implemented that use 1990 census data as a base.

APPENDIX 2: SUBJECTS FOR THE 1990 CENSUS OF POPULATION AND HOUSING

APPENDIX 2: SUBJECTS FOR THE 1990 CENSUS OF POPULATION AND HOUSING

100-PERCENT COMPONENT

Population

- Name
- Household relationship
- Sex
- Race
- Age
- Marital status
- Hispanic Origin

Housing

- Number of units in structure
- Number of rooms in unit
- Tenure
- Vacancy characteristics
- Congregate housing
- Value of owned unit or rent paid

SAMPLE COMPONENT

Population

- Social characteristics:
  - Education-enrollment and attainment
  - Place of birth, citizenship, and year of entry
  - Ancestry
  - Language spoken at home
  - Migration
  - Disability
  - Fertility
  - Veteran status

- Economic characteristics
  - Employment and unemployment
  - Occupation, industry, and class of worker
  - Place of work and commuting to work
  - Work experience and income in 1989

Housing

- Source of water and method of sewage disposal
- Autos, light trucks, and vans
- Kitchen facilities
- Year structure built
- Year moved into residence
- Number of bedrooms
- Farm residence
- Shelter costs, including utilities
- Plumbing
- Telephone
- Utilities and fuels

DM/ljb

Housing Statistics User Group

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COPY

April 12, 1988

The Honorable Mervyn M. Dymally
Chairman
Subcommittee on Census and Population
Committee on Post Office and Civil Service
608 House Office Building, Annex 1
Washington, DC 20515

Dear Mr. Chairman:

[For Record of Hearing on April 7, 1988]

The Housing Statistics Users Group (HSUG) is deeply gratified by the recent decision authorizing the Census Bureau to restore some essential questions to the 1990 Census of Housing and to utilize a sample of 17.7 million housing units. HSUG represents professional staff persons from 11 major private and public sector organizations concerned with housing data. We commend you and the Subcommittee for your strong support of these changes.

Only one major area remains unresolved -- the need to restore the questions on "plumbing" and "heating equipment" to the 100 percent form. These questions are essential for assessing the housing stock in rural areas; they also provide more flexibility in designing the variable sample to be used for the long form, assuring greater accuracy for urban and rural areas. We urge the Subcommittee to support these two additions to the 1990 Census.

Even with these changes, the 1990 Census of Housing will cover significantly fewer questions than in 1980. Specific questions dropped from 1980 would be:

-access to housing unit;
-water heating fuel;
-number of stories in building;
-presence of elevator;
-cooking fuel;
-number of bathrooms;
-air conditioning; and
-number of units at address.

In addition, the sample of 17.7 million housing units for 1990, to be used for the long form, would be less than the sample of 19.3 million households in 1980. This is despite the increase in the total number of U.S. households from 95 million to over 100 million during the decade.

Through the strong support of the Subcommittee, the 1990 Census of Housing will be restored to a satisfactory, if not optimum, level; and HSUG is deeply appreciative of the Subcommittee's actions.

Looking back to the past year and ahead to the future, HSUG has some observations that we believe should be noted:

1. The process by which changes were proposed by the Office of Management and Budget (OMB) is troublesome. A small group in the OMB proposed to make changes in the 1990 Census of Housing in a very short review period in the summer of 1987, bypassing the intensive three-year development process undertaken by the experienced, professional staff of the Census Bureau.

2. An official "Housing Advisory Committee" to the Census Bureau, which had been authorized for the last three decennial censuses, was eliminated for the 1990 Census. Other advisory groups (for population, marketing, economics, statistics, and three minority groups) were continued. Thus, those interested in housing data had no official relationship and no direct access to census planning. HSUG was created to try and fill this gap, but lacks the status of an official advisory group.

HSUG believes that this recent experience should stimulate measures to restore the responsibility for decennial census to the experienced, professional staff of the Census Bureau, and to re-authorize a "Housing Advisory Committee" as an official committee to the Census Bureau.

Housing should have a recognized, important status in the information-gathering agencies of the federal government.

We respectfully request that this letter be filed for your hearing record.

Sincerely yours,

Mary K. Nenno
Chairperson

Nation's Cities Weekly April 4, 1988

Housing data restored for Census

by Marvin McGraw

Sen. Paul Sarbanes (D-Md.), chairman of the Joint Economic Committee, was successful last week in his long efforts, on behalf of NLC, in getting the President's Office of Management and Budget (OMB) to restore the level of housing data to be gathered in the 1990 Census which OMB had been threatening to eliminate.

OMB's reversal is the culmination of more than eight months of discussion, hearings and debates which began last August when NLC Immediate Past President Cathy Reynolds called on the Congress and administration to rescind OMB's recommendations (See The *Weekly*, August 17, 1987).

"The battle is not over," Reynolds said ". . . the loss of valuable census housing information will cripple the ability of cities to respond to the needs of their citizens for more than a decade."

NLC President Pam Plumb, responding to the OMB decision stated, "this is a tremendous victory for cities across this nation. The National League of Cities applauds the efforts of Senator Sarbanes and extend our deep gratitude for the leadership he displayed in fighting this battle on behalf of the nation's cities.

Sen. Paul Sarbanes

"This victory was essential because an accurate and complete census is a key element in determining the level of federal funds that flow to local municipalities" Plumb said. "In a climate of budget deficits and reductions, local governments are hardpressed to find the necessary federal funding to provide such services as healthcare, homelessness, neighborhood revitalization and community development. OMB's decision will ensure that the level of the data collected in the 1990 census will enable local governments to receive their fair share of federal assistance."

A March 15 letter to President Reagan from Sarbanes, and 30 other House and Senate members (See The *Weekly*, March 28) urged "that the questionnaire for the 1990 Decennial Census . . . reflect fully the best professional judgment of the Census Bureau."

Previously, OMB had rejected the Census Bureau's recommendations that the housing questions follow a 100 percent coverage schedule to include 17 to 18 million households on a variable sample basis. As an alternative to this recommendation—using the argument of "minimizing the paperwork burden for the nation's households"—OMB had recommended that the sample size be reduced to 10 million households.

According to the Census Bureau, under the agreement reached with OMB, "some 17.7 million housing units will receive a long form in 1990 out of an estimated total of 106 million units. The sample will relieve about 1.6 million household from having to respond to the more detailed questionnaire compared with the sampling rates used in 1980."

As a result of this agreement, several

questions that had been considered for deletion by OMB have been retained. For example, the long form will include a question on the cost of utilities and fuels for both owners and renters. Questions on the value of owned unit or rent paid, and the total humber of rooms in the unit will be included on the short form.

The 1980 short-form questions on plumbing facilities and whether the unit is a condominium will be transferred to the long form.

In learning of the OMB decision, Sarbanes stated "I am gratified by the decision to allow the Census Bureau to proceed with a 1990 Census which will reflect the Bureau's best professional and technical judgment . . . The immediate concern of the Joint Economic Committee is a 1990 Census adequate to the task of supplying the fundamental statistical data needed for the final decade of this century.

"The Committee's longer-term concern is to assure that the traditional high quality of federal statistical programs is maintained and that new programs which meet the needs of a rapidly changing economy are developed. Reliable statistical information does not guarantee good policies, but is is an essential factor in making good policies more likely," Sarbanes further stated.

While the household sample has been increased in size, several key questions that were asked in 1980 will be deleted in 1990. The 1990 census will not include such questions as: Employment five years ago, Marital History and Weeks spent looking for work. In addition, such housing questions as Access to the unit, number of units at address, number of stories in building, number of bathrooms, air conditioning and heating equipment, types of water heating and cooking fuel and the presence of elevators will be deleted. An illustration of the types of questions to be asked on both the "long" and "short" form Census questionnaire appears in accompanying Table.

On another front, while the Census Bureau contends that the sampling is "designed to produce quality statistics for all segments of the population including the elderly, low income workers, Blacks, Hispanics, those of Asian and pacific island descent, American Indians, and Alaska Natives," the issue of a possible Census Undercount in the 1990 census is still being raised by Rep. Mervyn Dymally (D-Calif.), chairman of the House Subcommittee on Census and Population.

The Census Bureau will submit the questions for the 1990 census to Congress by April l, as required by law. ☐

SUBJECTS PLANNED FOR THE 1990 CENSUS
OF POPULATION AND HOUSING

100-Percent Component

Population	**Housing**
Name	Number of units in structure
Household relationship	Number of rooms in unit
Sex	Tenure
Race	Vacancy characteristics
Age	Congregate housing
Marital Status	Value of owned unit or rent paid
Hispanic Origin	

Sample Component

Population	**Housing**
Social characteristics:	Source of water and method of sewage disposal
Education-enrollment and attainment	Autos, light trucks, and vans
Place of birth, citizenship, and year of entry	Kitchen facilities
Ancestry	Year structure built
Language spoken at home	Year moved into residence
Migration	Number of bedrooms
Disability	Farm residence
Fertility	Shelter costs, including utilities
Veteran status	Condominium status
	Plumbing
	Telephone
Economic characteristics:	Utilities and fuels
Employment and unemployment	
Occupation, industry, and class of worker	
Place of work and commuting to work	
Work experience and income in 1989	

NOTE: Subjects covered in the 100-percent component will apply to all persons and housing units. Those covered by the sample component will apply to a portion of the population and housing units.

NDSU

North Dakota State University
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State University Station, P.O. Box 5636
Fargo, North Dakota 58105-5636

701-237-7441

March 31, 1988

The Honorable Lee H. Hamilton
United States Senate
Washington, D.C. 20510

Dear Rep. Hamilton:

It has come to our attention that the Office of Management and Budget (OMB) is requiring the Census Bureau to reduce the size of its sample for the 1990 decennial census from 17.8 million down to 10 million. We are aware that the Census Bureau completed a study outlining the impact of this action on data reliability, particularly on rural communities and subcounty jurisdictions.

Given the rural nature of our state, any diminution of reliability will have tremendous ramification for our data users. The vast majority of our communities (over 91 percent) have populations of less than 2,500. Nearly 82 percent have populations of less than 1,000. Thus, 1990 decennial census data on most of our communities may be of questionable reliability.

We receive a variety of requests for information from our data users. In 1987 over one-quarter of the nearly 2,400 requests (27.6 percent) we received involved population counts. This type of information should not be affected by a lower sample size. However, the remaining 72.4 percent of our requests pertained to information much of which was based on sample data. Allow me to illustrate with a couple of examples. First, over 13 percent of our requests were for income and poverty data. Of these, over a third were for place or subcounty level information. Second, nearly 16 percent of our requests involved a combination of information derived from sample data such as ancestry, education, employment, and housing data. Again, over one-third of the requests were for place or subcounty level information.

The impact of less-reliable information due to small samples will produce deleterious consequences for data users in our state and states like ours. It will affect planning efforts both because of data suppression and potential errors due to undercounts. Additionally, it may reduce our ability to obtain funding for communities because of inappropriate data. Finally, it can have tragic results for community development if efforts are built upon faulty data. As a result of these important implications, we request that you ask the OMB to reconsider their decision to reduce the sample size recommended by the Census Bureau.

Sincerely,

Richard W. Rathge, Director
State Census Data Center

RWR:lr

NDSU is an equal opportunity institution.

UNITED STATES DEPARTMENT OF
COMMERCE
NEWS
WASHINGTON, D.C. 20230

BUREAU OF
THE
CENSUS

Public Information Office
(301) 763-4040

REVISED ATTACHMENT

For Immediate Release
CB88-49

CENSUS BUREAU AND OMB AGREE ON 1990 QUESTIONNAIRES, SAMPLE SIZE

The Office of Management and Budget and the Commerce Department's Census Bureau have agreed on the number of households to be sampled in the 1990 census, and on which questions to ask on the census forms.

The agreement, culminating several months of discussion and research that included broad public participation, is designed to minimize the paperwork burden for the nation's households while improving or maintaining the quality of the data collected.

Under the agreement, some 17.7 million housing units will receive a long form in 1990 out of an estimated total of 106 million units. The sample will relieve about 1.6 million households from having to respond to the more detailed questionnaire compared with the sampling rates used in 1980.

Sampling rates will vary depending on the density of the population and geographic location. They are designed to produce quality statistics for all segments of the population including the elderly, low income workers, Blacks, Hispanics, those of Asian and Pacific Island descent, American Indians, and Alaska Natives.

(more)

OMB and the Census Bureau have agreed to retain some questions on the 1990 forms that had been considered for deletion. The long form will include a question on the cost of utilities and fuels for both owners and renters. Questions on the value of owned unit or rent paid, and the total number of rooms in the unit will be included on the short form. The 1980 short-form questions on plumbing facilities and whether the unit is a condominium will be transferred to the long form.

Questions asked in the 1980 census to be deleted for 1990 include employment five years ago, marital history, and weeks spent looking for work, as well as housing questions on access to the unit, number of units at address, number of stories in building, number of bathrooms, air conditioning and heating equipment, types of water heating and cooking fuel, and presence of elevator.

The Census Bureau will submit the questions for the 1990 census to Congress by April 1, as required by law. The Bureau now enters its final operational planning stage and will begin its outreach program to encourage the participation of all residents.

-X-

Mar. 29, 1988

REVISED

SUBJECTS PLANNED FOR THE 1990 CENSUS OF POPULATION AND HOUSING

100-Percent Component

Population

Name
Household relationship
Sex
Race
Age
Marital Status
Hispanic Origin

Housing

Number of units in structure
Number of rooms in unit
Tenure
Vacancy characteristics
Congregate housing
Value of owned unit or rent paid

Sample Component

Population

Social characteristics:
- Education--enrollment and attainment
- Place of birth, citizenship, and year of entry
- Ancestry
- Language spoken at home
- Migration
- Disability
- Fertility
- Veteran status

Economic characteristics:
- Employment and unemployment
- Occupation, industry, and class of worker
- Place of work and commuting to work
- Work experience and income in 1989

Housing

Source of water and method of sewage disposal
Autos, light trucks, and vans
Kitchen facilities
Year structure built
Year moved into residence
Number of bedrooms
Farm residence
Shelter costs, including utilities
Condominium status
Plumbing
Telephone
Utilities and fuels

NOTE: Subjects covered in the 100-percent component will apply to all persons and housing units. Those covered by the sample component will apply to a portion of the population and housing units.

Colorado State University

Cooperative Extension
Colorado State University
Fort Collins, Colorado 80523

March 29, 1988

Senator Paul Sarbanes, Chairman
Joint Economic Committee
United States Senate
Dirkson S. O. B.
SD-G01
Washington, D.C. 20510

Dear Senator Sarbanes:

Because we are a supplier of census and other data to several hundred subscribers (the County Information Service), we are concerned about an OMB directive to reduce the number of households to be sampled in the upcoming population census. To reduce the sample size from 17.8 million to 10.0 million will cause a serious loss of reliability of the data and affect the confidence we can have in analyses which use the population/households data.

Our clientele will be concerned about the census data, for (1) they make practical use of data and (2) they work principally in lightly populated, rural areas. In communities having populations of less than 2,500, error levels will be double those of the 1980 census--even with some concentration of the sample in those areas.

A congressional hearing on this subject will be held in Washington, D.C.; it will be chaired by Congressman Dymally. I hope you will express your opposition to the directive of OMB, giving your support to the Bureau of the Census. Bureau personnel are well qualified to judge the design and implementation of the new census of the population.

Thank you.

Sincerely,

Warren L. Trock

Warren L. Trock
Director,
County Information Service
Department of Agricultural
and Resource Economics

WLT:dkd

Congress of The United States

Joint Economic Committee

PRESS RELEASE

100th Congress

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Hamilton Fish, Jr., NY
Alex McMillan, NC

Judith Davison
Executive Director

Contact:

Debra Silimeo
(202) 224-5171

1988— 12

FOR IMMEDIATE RELEASE:
Tuesday, March 29, 1988

The 1990 Census

Senator Paul S. Sarbanes (D-MD), Chairman of the Joint Economic Committee, issued the following statement today in response to OMB's decision on the 1990 Census questionnaire:

"I am gratified by the decision to allow the Census Bureau to proceed with a 1990 Census which will reflect the Bureau's best professional and technical judgement.

This decision appears to be a response by OMB to broad-based, bipartisan concerns that earlier proposals to truncate the Census questionnaire and to reduce the sample size would have serious adverse effects on both public and private decision-making over the next decade.

I am pleased that OMB has accepted the Census Bureau's recommendations to restore several important housing questions to the short form, including the questions on rent and value, to retain questions on the cost of utilities and fuels, and to conduct a household sample large enough to produce reliable national data.

The immediate concern of the Joint Economic Committee is a 1990 Census adequate to the task of supplying the fundamental statistical data needed for the final decade of this century.

The Committee's longer-term concern is to assure that traditional high quality of federal statistical programs is maintained and that new programs which meet the needs of a rapidly changing economy are developed. Reliable statistical information does not guarantee good policies, but it is an essential factor in making good policies more likely."

IOWA STATE
UNIVERSITY

Census Services (ICS)
320 East Hall [illegible]
Ames, Iowa 50011
Telephone: 515/294-[illegible] 8337

28 March 1988

Senator Paul Sarbanes, Chair
Joint Economic Committee
SD-G01 Dirkson Senate Office Building
Washington, DC 20510

Dear Senator Sarbanes:

The U.S. Bureau of the Census is contesting decisions made by the U.S. Office of Management and Budget concerning the number of households to be included in the sample receiving the long form of the census questionnaire on April 1, 1990. Census recommends sampling 17.8 million households while OMB wants this limited to 10 million.

This is a crucial issue in states with large numbers of geographic areas with relatively small populations. Iowa has more than 950 incorporated places, the majority of which have fewer than 1,000 residents. Yet it is vital that we know as much as we can about these places if they are to be included in rural economic development efforts. Iowa also has a relatively large proportion of older residents; in 1980, we had a greater proportion 85 or older than any other state. For the state, counties, and towns to effectively serve the needs of older residents, we need to be able to provide as much data as we possibly can about them.

The reduction of households sampled with the long form of the 1990 census questionnaire will greatly reduce the likelihood of having necessary and sufficient information on small incorporated places and subgroups of the population such as the elderly. In Iowa, that combination--small places and older people--is important; we have many small towns with relatively high proportions of older residents. The 1980 census provided exceptionally useful data for such populations. I ask your help in ensuring that information from the 1990 census will be of similar quality. The best way of doing this is to make sure that the bureau's recommended level of 17.8 million households be sampled with the long form questionnaire in 1990.

Sincerely,

Willis J. Goudy

Willis J. Goudy
Professor of Sociology
and Coordinator of Census Services

House, Senate push Reagan on census

by Marvin McGraw

The 1990 Decennial Census is two years away, however, the debate over the questionnaire to be used in taking the census has reached the halls of Congress. Led by Senator Paul Sarbanes (D-Md.), chairman of the Joint Economic Committee, twenty-eight (28) members of Congress sent a joint letter to President Reagan, on March 15, urging "... that the questionnaire for the 1990 Decennial Census... reflect fully the best professional judgment of the Census Bureau."

The Census Bureau had recommended last year that the housing questions follow a 100 percent coverage schedule to include 17 to 18 million households on a variable sample basis. However, the President's Office of Management and Budget (OMB) has proposed that the sampling be reduced to 10 million households.

The legislators expressed concern "... that the questionnaire will be seriously weakened if it incorporates the significant revisions which OMB has directed the Census Bureau to make." The deadline date for the Census Bureau to report to Congress on the final housing content of the questionnaire is April 1, 1988.

At issue is the recommendation proposed last year by OMB that involved major changes in the Census procedure that would limit the Census questionnaire by shifting most housing questions to the sample form, eliminating entirely questions on the cost of utilities and reducing the sample size by one-half.

"There is deep and widespread concern," the letter continues "among state and local officials and housing statistic users in the private sector that the truncated questionnaire will result in more limited and less accurate data, with important adverse implications for public and private-sector decisionmaking over the coming decade."

Although OMB has not announced a final decision on the 1990 census questionnaire, the letter stated that "overall, a questionnaire reflecting the OMB proposals would result in a significant reduction in the stock of detailed statistical data available to the public, the states, and localities, not to mention the Congress and the Executive Branch."

"It would reduce the reliability of data for any small area or group, including the elderly population" according to the signers.

OMB has the authority to review the Census questionnaire under the Paperwork Reduction Act—which is supposed to provide a "cost-saving" to the Federal government, however, the letter that was sent to President Reagan pointed out that "in proposing to reduce the questionnaire, OMB made it clear that the proposal was not motivated by budgetary concerns and indeed has offered no evidence that it would produce cost savings."

Rather, the letter states that "cutting the Census in 1990, would increase costs to Federal, state, local, and private-sector statistics users in the next decade."

Joining Senator Sarbanes in this effort are:

SENATORS

Proxmire (D-Wis), chairman of the Senate Banking, Housing and Urban Affairs Committee; Committee members D'Amato (D-NY), Chafee (R-RI), Dodd (D-CT), Dixon (D-Ill), Riegle (D-Mich.), Shelby (D-Ala.), and Heinz (D-Pa.); Majority Whip Cranston (D-Calif.) and Kennedy (D-Mass), Bingaman (D-N. Mex.) and Melcher (D-Mont.)

REPRESENTATIVES

St Germain (D-RI) and chairman of the House Banking, Finance and Urban Affairs Committee; Gonzalez (D-Tx), Bonker (D-WA), Roybal (Calif), Hammerschmidt (R-Ariz.), Ridge (R-Pa.), Roukema (R-NJ), Wylie (R-OH), Solarz (D-NY), Hamilton (D-Ind.), Obey (D-Wisc.), Hawkins (D-Calif), Scheuer (D-NY), Stark (D-Calif) and Mfume (D-Md.) □

Reagan veto on Civil Rights bill overridden

By a vote of 292 to 133 in the House and 73-to-24 in the Senate, the Congress overrode President Reagan's veto of the Civil Rights Restoration Act. The action by the Congress ended a four-year battle with the Administration and successfully reinstated federal protections against discrimination on grounds of race, sex, age or physical disability that were sharply curtailed by the 1984 Supreme Court ruling in *Grove City College v. Bell.*

Washington
State University

Department of Sociology / Department of Rural Sociology, Pullman, Washington 99164-4006 / 509-335-8623

March 22, 1988

Senator Paul Sarbanes, Chairman
Joint Economic Committee
SD-G01 Dirkson S. O. B.
U.S. Senate
Washington, D.C. 20515

Dear Senator Sarbanes:

I am writing concerning the very substantial and detrimental reduction in sample size proposed by the Office of Management and Budget for the 1990 Census.

Currently OMB is proposing a sample size for the "long form" of the Census of 10 million households. This sample size has been arrived at against the recommendations of porfessional statisticians and without requesting input from data users around the nation. Although, OMB is allowed to make such recommendations under the Paperwork Reduction Act, this act also mandates that the clearance process allow for public comment, a step that OMB is doing its best to bypass.

Statisticians at the Bureau of Census estimate that a sample size of around 17.8 million household will be required in 1990 in order to maintain error levels for all geographic levels no worse than those provided in 1980.

The "long form" of the census is so important, because this is the backbone of the our nation's efforts to monitor the social and economic status of its citizenry. This form contains the questions on a wide variety of employment characteristics and experiences that serve as a benchmark to track employment throughout the coming decade. It also contains information on disabilities, educational levels and english language ability, transportation to work and a variety of housing quality indicators.

If the sample of 10 million households is maintained, these data will be extremely unreliable for small areas. Of course, rural areas jump to mind as the "small areas" which will be adversely affected. Indeed statisticians estimate that error levels will double in rural areas.

However, most city census tracts are also "small areas" consisting of between 1,000 and 2,500 housing units. Here error levels will increase between 40% and 100%.

In addition data will be much more unreliable for minorities because of their smaller populations. This will make it extremely difficult for local areas to plan a wide variety of programs for the special needs of specific neighborhoods and minorities.

Although the decennial censuses are important for tracking broad national trends, they are much more important at the local level for program planning, targeting and justification for grant requests. It is a shame to spend as much as our nation does on its decennial census and then to have the data be of questionable use for these purposes.

On April 14th, Congressman Dymally will hold a hearing on this issue. I sincerely hope that the information with which I have provided you has convinced you of the importance of a sample size of at least 17 million households in 1990, and that you will contact Congressman Dymally to this effect. If not, I know that the staff at the Bureau of Census would be happy to provide you with additional insights.

I appreciate your taking this time to listen to this appeal. I work with the census daily and help others use the information therein. I know that it is critical that we have the most reliable data possible in the coming decade to better address the multitude of social and economic problems that confront our nation and its cities and rural areas.

Sincerely,

Annabel K. Cook

Annabel Kirschner Cook, Ph.D.
Extension Sociologist
Census Data Coordinator

cc: James C. Miller III, Director
Office of Management and Budget

John G. Keane, Director
Bureau of the Census

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JUDITH DAVISON
EXECUTIVE DIRECTOR

Congress of the United States
JOINT ECONOMIC COMMITTEE
(CREATED PURSUANT TO SEC. 5(a) OF PUBLIC LAW 304, 79TH CONGRESS)
Washington, DC 20510

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J ALEX McMILLAN NORTH CAROLINA

March 15, 1988

The Honorable Ronald W. Reagan
President of the United States
The White House
Washington, D.C. 20500

Dear Mr. President:

We are writing to urge that the questionnaire for the 1990 Decennial Census, to be submitted to Congress by April 1 of this year, reflect fully the best professional judgment of the Census Bureau. We do so out of concern that the questionnaire will be seriously weakened if it incorporates the significant revisions which the Office of Management and Budget (OMB) has directed the Census Bureau to make.

In connection with the 1988 Census Dress Rehearsal, OMB last year proposed major changes that would limit the Census questionnaire by shifting most housing questions to the sample, eliminating entirely questions on the cost of utilities and reducing the sample size by one-half. As a practical matter, reductions in the Dress Rehearsal are virtually certain to be reflected in the final census questionnaire. It appears that the Census Bureau has interpreted the OMB proposals for the Dress Rehearsal as binding on the Census questionnaire.

There is deep and widespread concern among state and local officials and housing statistics users in the private sector that the truncated questionnaire will result in more limited and less accurate data, with important adverse implications for public and private-sector decisionmaking over the coming decade. Overall, a questionnaire reflecting the OMB proposals would result in a significant reduction in the stock of detailed statistical data available to the public, the states, and localities, not to mention the Congress and the Executive Branch. It would reduce the reliability of data for any small area or group, including neighborhoods, traffic analysis zones, minority groups, and the elderly population. State and local officials have warned that it would undercut their ability to target limited resources. Private-sector spokesmen have warned that it would make development and construction planning more difficult.

Given the concerns summarized above, it is not surprising that the OMB proposals are vigorously opposed by the Housing Statistics Users Group. The Group is a broad-based umbrella organization that includes the Mortgage Bankers Association, the National Association of Home Builders, the Housing Assistance Council, the AFL-CIO, the National Council of Savings Institutions, the National League of Cities, the National Association of Realtors, and the National Association of Housing and Redevelopment Officials.

It is also worth noting that, in proposing to reduce the questionnaire, OMB made it clear that the proposal was not motivated by budgetary concerns and indeed has offered no evidence that it would produce cost savings. Cutting the Census in 1990, however, would increase costs to Federal, state, local, and private-sector statistics users in the next decade.

The decennial Census provides information which cannot be obtained from any other source, and serves as a bench mark for numerous other important surveys. In our judgment it should be formulated and implemented according to the highest professional standards of competence and integrity. We urge you, therefore, to take the necessary steps to assure that the Census questionnaire submitted to Congress pursuant to the requirements of 13 USC 141(f) reflects the best professional judgment of the Census Bureau.

Sincerely,

Paul Sarbanes
Paul S. Sarbanes
U.S.S.

Bill Proxmire
William Proxmire
U.S.S.

Alfonse D'Amato
Alfonse D'Amato
U.S.S.

Alan Cranston
Alan Cranston
U.S.S.

John Heinz
John Heinz
U.S.S.

PSS:jdt

Hon. Ronald Reagan
March 15, 1988
Page Three

Fernand J. St Germain, M.C.

Henry B. Gonzalez
Henry B. Gonzalez, M.C.

Don Bonker
Don Bonker, M.C.

Edward R. Roybal
Edward P. Roybal, M.C.

John Paul Hammerschmidt
John Paul Hammerschmidt, M.C.

Tom Ridge
Thomas J. Ridge, M.C.

Marge Roukema
Marge Roukema, M.C.

Chalmers P. Wylie, M.C.

Stephen J. Solarz
Stephen J. Solarz, M.C.

Lee H. Hamilton, M.C.

David R. Obey, M.C.

Hon. Ronald Reagan
March 15, 1988
Page Four

Jeff Bingaman
Jeff Bingaman, U.S.S.

John Melcher
John Melcher, U.S.S.

Don Riegle
Donald Riegle, U.S.S.

Edward M. Kennedy, U.S.S.

Alan J Dixon
Alan J. Dixon, U.S.S.

Christopher J. Dodd, U.S.S.

Richard C. Shelby
Richard C. Shelby, U.S.S.

John Chafee
John H. Chafee, U.S.S.

Hon. Ronald Reagan
March 15, 1988
Page Five

Augustus F. Hawkins
Augustus F. Hawkins, M.C.

Jim H Scheuer
James H. Scheuer, M.C.

Pete Stark
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Kweisi Mfume
Kweisi Mfume, M.C.

Hamilton Fish Jr

Hamilton Fish, Jr.

Olympia Snowe

Olympia J. Snowe

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JUDITH DAVISON
EXECUTIVE DIRECTOR
(202)226-3231

Congress of the United States
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Washington, DC 20510

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J ALEX McMILLAN NORTH CAROLINA

March 21, 1988

Ms. Hanna Bell
Legislative Correspondence Unit
The White House

Dear Ms. Bell:

Here is the page that was inadvertently omitted from the letter that we sent you last week. If you have any questions, please do not hesitate to give me a call.

Sincerely,

Daniel Melnick

NATIONAL
ASSOCIATION
of
COUNTIES

440 First St. NW, Washington, DC 20001
202/393-6226

COMMUNITY AND ECONOMIC DEVELOPMENT STEERING COMMITTEE

RESOLUTION

OPPOSING REDUCTION IN SAMPLING SIZE OF THE 1990 DECENNIAL CENSUS AND DELETION OF HOUSING DATA

WHEREAS, local government officials rely upon the availability and accuracy of decennial census data for planning and resource allocation and for implementing policies which address the need for housing, community facilities, social services and infrastructure; and

WHEREAS, county officials extensively use block and small area data from the decennial census; and

WHEREAS, the Office of Management and Budget proposes to curtail coverage of housing questions and reduce the sample for the long form in the 1990 decennial census;

WHEREAS, NACo and other members of the Housing Statistics Users Group conclude that the content of the 1990 housing census be carried forward as submitted by the Cenusu Bureau in April, 1987;

THEREFORE BE IT RESOLVED, that the Community and Economic Development Steering Committee of the National Association of Counties recommends that priority be given to returning the question on plumbing facilities from the sample survey to the 100 percent schedule. This question addresses the important issue of housing quality and provides a measure of substandard housing. The steering committee also recommends restoration to the 100 percent schedule the question on number of rooms which is used to assess overcrowding, and the question on monthly rent and whether rent includes meals. County officials use this data to measure the availability of congregate housing and develop housing for various household compositions; and

BE IT FURTHER RESOLVED, that the NACo Community and Economic Development Steering Committee opposes the deletion altogether of the question on yearly cost of utilities and fuel. Without this item, it will be impossible to compute gross rent which is used extensively in housing cost analysis. Data also should reveal whether utility costs are included in a respondent's rent; and

BE IT FURTHER RESOLVED, that the NACo Community and Economic Development Steering Committee urges that the sample size for the long form consist of 17 to 18 million households on a variable sample basis; and

BE IT FURTHER RESOLVED, that the NACo Community and Economic Development Steering Committee recommends that the content of the 1990 housing census be carried forward as submitted by the Census Bureau to Congress in April, 1987.

Adopted by the Steering Committee - March 5, 1988

UNITED STATES DEPARTMENT OF COMMERCE
Bureau of the Census
Washington, D.C. 20233

OFFICE OF THE DIRECTOR

NOV 2 7 1987

MEMORANDUM FOR C. Louis Kincannon
Deputy Director

From: Charles D. Jones CJ
Associate Director for Decennial Census

Subject: Implications of the Dress Rehearsal Clearance

This is additional information about the September 16 letter from the Office of Management and Budget (OMB) concerning the Census Bureau's June 17 request for clearance of questionnaires for the 1988 Dress Rehearsal. I am forwarding information on the implications of the guidance OMB provided for the design and content of the 1990 census. The content and sample size reductions OMB has proposed will affect negatively the statistical reliability and general utility of the census results during the decade of the 1990s.

We believe that variable rate sampling should be used in the dress rehearsal and 1990 census. ~~We do not agree~~, however, ~~with the sample size limitation of 10 million housing units for the census.~~ [redacted] ~~size will reduce data quality for 65 percent of households, for more than 50 percent of~~ the design areas (governmental units, census tracts, ~~and block numbering~~ [redacted] ~~for population subgroups, such as American Indians, Asians and Pacific Islanders, Hispanics, Blacks, and the elderly.~~

We propose a sample size of approximately 17.8 million housing units for the 1990 census. This sample would incorporate the following features. (The coefficients of variations, or CVs, and probabilities discussed here refer to a 10-percent population characteristic. Data for housing characteristics would have similar relationships although with larger CVs.)

- Variable rate sampling (see Attachment 2).
- Equal CV for each design area. Each design area would have a CV of about 10 percent (see Attachment 2).
- Maintain or improve the statistical precision of the 1980 census for 60 percent of the housing units and 77 percent of the design areas (see Attachment 2).
- For large census tracts (2,500 or more housing units), strike a compromise between the relatively good precision of the 1980 census (with a CV of about 7 percent) and the significant increase in sampling error over previous censuses (a 15-percent CV) suggested by the sampling plan received from the OMB. These tracts contain about a third of the population and comprise 13 percent of the design areas (see Attachment 2).

- For each design area, provide a chance of about 2-in-3 that a sample estimate will be within 1 percentage point of the actual value. Under the OMB sampling plan, the chance of this happening would be about 1-in-2. That is, about half of the areas would have a sample estimate more than 1 percentage point away from the actual value (see Attachment 2).
- Reduce the estimated average response time per housing unit in the 1990 census by about 13 percent, relative to the comparable figure before the 1980 census. This reduction is a result of sample design change and reduction in content (see Attachment 1).
- Be responsive, in our opinion, to the needs of census data users across the Nation (see Attachment 3).

I am enclosing four reports with this memorandum. The first of these summarizes the Census Bureau's reaction to various points conveyed in the OMB's September 16 letter; it also has a comparison of the estimated response burden calculations for 1980 and 1990. The second report is an evaluation of alternative sampling plans, including the plan proposed by the OMB, for the 1990 census. The third report is an assessment of the data quality implications of the OMB sampling plan. The fourth report documents comments about the content issues raised in the OMB's September 16 letter.

Attachments

cc: W. Butz (DIR)
P. Bounpane
P. Heelen
S. Courtland (PPDO)
F. Ruth (CAO)
M. McKay (OMSD)
J. Briner
P. Schneider (POP)
P. Fulton
N. McKenney
A. Young (HOUS)
L. Norry
C. Young
J. Thompson (STSD)
R. Griffin
H. Woltman
S. Miskura (DPLD)
P. Berman
R. Brown
J. Dinwiddie
R. Bair
A. Paez
P. Lichtman-Panzer
D. Dwyer

Attachment 1

Observations Concerning the September 16, 1987 Reply by the Office of Management and Budget to the Census Bureau's Initial Request to Clear Questionnaires for the 1988 Dress Rehearsal

- Sample design and size (summary), p. 1
- Mail return rates, p. 2
- Failed-edit operations, p. 3
- Population coverage, p. 4
- Response burden, 1980 and 1990, p. 6

Bureau of the Census
October 1987

Sample size and design

The Office of Management and Budget (OMB) stated that it wants to improve the quality of results from the 1990 census. But the proposed reduction in the size of the sample demonstrably and substantially contradicts this objective. If adopted, the OMB sample size limitation of 10 million housing units clearly will decrease the quality of data, especially for numerically small populations (such as American Indians, Hispanics, and the elderly), as well as for most data publication areas and the vast majority of the population.

In response to concerns about respondent burden and dollar cost, the Census Bureau has reduced the sample sizes in the last three censuses and, as a result, there have been marginal decreases in precision of the sample estimates. As the sample size dropped, the coefficient of variation on a 10-percent characteristic for tracts of 1,000 to 2,500 housing units, which contain half of the population, has crept up from 8 percent (1960) to 9 percent (1970) to 10 percent (1980). A much more dramatic increase in error would occur for 1990 under the OMB plan. For example, in census tracts having 1,000 to 2,500 housing units, a 10-percent coefficient of variation for 1980 would become 14 percent in 1990, an increase far greater than those for the last three censuses. In other terms, the sampling error for 1990 data would increase by 40 percent over the 1980 levels. For larger census tracts (above 2,500 housing units), the results of the OMB decision are even more damaging: the error would be double that of the 1980 results. The detrimental effects on data quality for this one-third of our population and 13 percent of our design areas would be dramatic.

The OMB plan has considerable appeal with respect to the precision of estimates for sparsely populated places. It would maintain the 1980 precision levels for places with fewer than 1,000 inhabitants, where only 3 percent of our Nation's population lives. The Census Bureau supports this objective and has incorporated it into the alternative 1990 census sampling plan (see Attachment 2).

The OMB letter also suggests that reducing the sample size will reduce nonsampling error and, thus, the total error in the data. Neither data nor statistical theory support this contention. For example, some components of nonsampling error associated with sample data are independent of the sample size and, thus, would not be affected by a reduced (or increased) sample size.

This can be seen in two ways. First, almost every model used to express the total error in an estimate produced from a survey, such as the 1990 census sample, expresses the error as the sum of a sampling error component and two or more components due to respondent and other errors (such as enumerator error). These error models clearly demonstrate that the nonsampling errors are independent of the sampling errors. Second, the Census Bureau conducted an enumerator variance study that indicated that the level of enumerator error in the 1970 census data was the same or slightly higher than in 1960. In 1970, the enumerator assignment size was about one-half that in 1960, suggesting that for a fixed number of enumerators, reducing the enumerator follow-up work load (and, as a result, the sample size) does not necessarily guarantee a reduction in the enumerator error component.

Mail return rates

The OMB letter contends that reducing the number of households that receive the sample questionnaire (or long form) would improve the mail return rate and reduce the number of field enumerators needed to visit nonresponding households. **We share the OMB objective of a higher mail return rate, but the Census Bureau knows from evidence and experience that reducing the number of units that receive the long form to the OMB limit of 10 million would have a trivial effect on the mail return rate.**

There has been relatively little difference between the mail return rates of census short-form and long-form recipients in an actual census. In the 1980 census, the overall mail return rate for short-forms was only 1.5 percentage points higher than that for long-forms. The OMB points out that the mail return rates are lower among selected population subgroups residing in metropolitan areas. Even in these areas, however, there is little difference between the rates by type of form. In 1980, the short-form mail return rate for large metropolitan areas was 2.5 percentage points higher than the long-form rate. In some of our test censuses, we have observed wider differences between the mail return rates of short-form and long-form respondents, but these test census results are not supported by actual census results.

Based on this experience, the Census Bureau concludes that reducing the sample size would have a trivial effect on the overall mail return rate in 1990. Applying the 1980 mail return rates by form type to the sample design proposed by the OMB for 1990, the Census Bureau estimates an increase in the overall mail return rate of 0.1 of 1 percent for the 1990 questionnaires. The estimated effect is so small that there would be no reduction in the number of enumerators needed in 1990.

In a similar vein, the OMB decision to reduce the number of questions on the dress rehearsal short form appears to be based on the assumption that this would increase the mail return rate for the form. Our comparison (summarized above) of long and short forms that have much greater differences in their relative length than OMB proposes for the 1990 forms suggests that the mail return rates are almost unrelated to the length and content of the questionnaires. The OMB assumption is at best speculative--clearly not a sound basis for making radical changes in the content of the decennial census.

Failed-edit operations

While it is true (as stated in the OMB letter) that some 20 percent of short forms and 45 percent of long forms "failed edit" in 1980, most of these did not require field follow-up by enumerators. In centralized offices, the failed-edit operation comprised three separate phases--office edit, office telephone contact, and enumerator follow-up. In decentralized offices, the office telephone contact phase was not used in 1980, although enumerators were allowed to use their personal telephones.

Data from the 1985 test censuses clearly show (Table A) that the large majority of failed edit questionnaires are completed by office staff using either the clerical or telephone contact procedures. Also, the Census Bureau experience demonstrates a greater success at hiring and retaining a temporary staff for office rather than for field operations. The OMB letter states that the Census Bureau will be needing more than 300,000 enumerators in 1990; this is incorrect. This figure is an estimate of the total peak-period work force for staffing the regional and district offices, including many jobs other than enumerators. For 1990, we plan to implement the office telephone contact phase of the failed-edit operation for all of our field offices. With this change, we should reduce the number of enumerators required for the field-work phase of the failed-edit operation.

Table A. 1985 test censuses: Percent of failed edit questionnaires completed, by type of operation (Data based on short forms and 100-percent component of long forms)

Site	Clerical operation	Telephone	Field enumerators
Jersey City	51.7	30.9	17.4
Tampa	54.0	32.9	13.1

The field-work phase of the failed-edit operation is conducted after nonresponse follow-up operations and constitutes a far smaller workload. In addition, the failed-edit operation is conducted simultaneously with the vacant-delete and residual nonresponse operations, so that the vast majority of enumerators would be needed even if the failed-edit rate dropped to zero.

Population coverage

A presumption that the length and content of the census questionnaire affects coverage (the completeness of population counts) is a principal rationale for the OMB's action. The OMB suggests that maximizing the proportion of respondents asked to complete a census short form contributes to coverage improvement and that, by dropping questions from the short form, coverage of the population would be improved even further.

The OMB based its arguments largely on results of a few focus groups. Focus groups can be useful vehicles for identifying hypotheses that might warrant testing, but--because of the small number of persons participating in these informal discussions, their unrepresentative make ups, and the conditioning influences upon the members by the discussion leader and the process itself--they provide no basis for changing a statistical program, much less for making radical changes in the decennial census.

The Census Bureau finds no statistical evidence to support the OMB contention of the existence of a relationship between questionnaire length and coverage. In the 1940 census, no forms were handed out, and all data were gathered by enumerators who asked the questions and recorded the answers in a book. Similarly in 1950, forms were not given to respondents, and enumerators recorded replies in a book. The 1960 census was the first in which forms were handed out to respondents. In two-stage areas (the majority of the population), short forms were sent to every housing unit. When the short forms were picked up, if the unit was in sample, a long-form questionnaire was administered to the occupants. In the 1970 and 1980 censuses, either a short form or a long form was sent to each housing unit in the mail-census areas. The three earlier censuses (in which long forms were not distributed) had worse overall and Black population coverage than the two more recent censuses, in which respondents knew the content and length of the self-administered questionnaires (Table B). Because of other procedural differences among these censuses, these results are confounded. They certainly do not, however, support the OMB contention.

Table B. Population coverage of censuses, 1940-1980
(Percent of population covered)

	Population	
Census	Total	Black
1940	94.4	89.7
1950	95.6	90.4
1960	96.7	91.7
1970	97.1	92.0
1980*	98.6	94.1

* The estimated population included approximately 3 million undocumented residents.

The OMB contention and the focus group reports suggest interesting hypotheses that should be tested before the year 2000 census. However, ~~the potential~~ loss in quantity ~~and~~ quality of data for 1990 is great, without any evidence that coverage ~~improvements~~ will result..

Congress of the United States
House of Representatives

STEVE NEAL
5th District, North Carolina

September 17, 1987

The Honorable Paul Sarbanes
Joint Economic Committee
Washington, D.C. 20510

Dear Mr. Chairman:

It has come to my attention that the Office of Management and Budget (OMB) is considering eliminating 30 questions from the 1988 Census Dress Rehearsal. I share the concern that if questions are taken off the questionnaire for the Dress Rehearsal, the 1990 Census will also reflect the omissions. Without those questions, state and local governments will suffer from the loss of vital statistics.

All of the questions under special review are of major importance to the formulation of government policy.

I appreciate your efforts to prevent the OMB from seeing its plan to fruition. Please let me know if I may be of any assistance.

Sincerely,

Steve

STEPHEN L. NEAL
U.S. Congresssman

SLN/kgz

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EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

SEP 16 1987

Honorable Katherine M. Bulow
Assistant Secretary for Administration
Department of Commerce
Washington, D.C. 20230

Dear Kay:

On June 17, 1987, the Bureau of the Census submitted its dress rehearsal for the 1990 census to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1980. As I informed the Department on Tuesday, September 15, 1987, we have concluded our review and are unable to approve the proposed dress rehearsal, as submitted. I have discussed our concerns with Departmental officials, and appreciate their cooperation with our Paperwork Reduction Act review. This letter is to elaborate upon our discussion.

Under the Paperwork Reduction Act (the Act), Federal agencies that propose to collect statistical and other information are required to submit their proposals to OMB and to demonstrate to OMB and the public that the utility of each question and the needs to which it responds justify the cost and burden involved. OMB is required to review and either approve or disapprove each proposal based on criteria set forth in the Act. Specifically, before approving any collection of information, OMB is required to determine that the information has practical utility and that the collecting agency has reduced "to the extent practicable and appropriate the burden on persons who will provide the information."

The Paperwork Reduction Act also makes OMB responsible for establishing and overseeing standards for Federal statistical programs, in order to maintain and improve the quality of government statistics. OMB's information collection reviews for statistical surveys such as the decennial census focus not only on burden but also on quality issues. Regarding general purpose statistics, practical utility is defined as the actual, not the theoretical or potential, usefulness of information to agencies and the public, taking into account its accuracy, adequacy, and reliability, and the agency's ability to process the information in a useful and timely fashion.

Our review of the proposed dress rehearsal included numerous discussions with Census Bureau staff and a careful analysis of material submitted by the Bureau and comments to our public docket. For the reasons indicated below, and in accordance with the Act and 5 CFR 1320.12, we are disapproving the proposal as submitted by the Census Bureau. The questionnaires and sampling design submitted for review do not meet the criteria of practical utility and minimization of burden established by the Act.

However, we believe that Census can improve the proposed dress rehearsal so that it meets the criteria of the Act. OMB is well aware of the schedule the Census Bureau must meet in order to conduct a useful dress rehearsal and a successful census in 1990, and urges the Bureau to consider our proposed changes expeditiously. Upon resubmission of a modified proposal, OMB will conduct its review quickly, while providing an adequate opportunity for public comment.

Below, we describe in detail the reasons for our action and how the dress rehearsal can be modified to meet the standards of the Act.

Background

The Bureau estimates that the 1990 census will cost $2.6 billion to carry out and will impose a paperwork burden of approximately 32 million hours on respondents. These levels of public expenditure and burden alone mean that the 1990 census must meet a high standard for both quality and utility. But more important, the 1990 census must be able to meet its basic Constitutionally-required purpose of counting the population of the Nation. These fundamental data are necessary to apportion congressional districts among the States and are also used to determine the allocation of billions of Federal dollars. If the Census Bureau does not accurately count the population, congressional representation may be inaccurate and Federal dollars may be inequitably distributed.

Any effort to ensure an accurate count must address the risk that people will not mail in or answer correctly a questionnaire that they consider too long or that contains questions that they consider intrusive or inappropriate. During the 1980 census, the Bureau experienced significant difficulties in getting complete and accurate response. Court cases are still pending, in fact, that contest the Census Bureau's count. We believe that Census must take significant steps to improve response rates and the quality of the data collected.

The Census Bureau has proposed a "short" form that consists of 17 questions (7 questions on each individual in the household and 10 housing questions) that are to be answered by each household in the United States. The "long" form, with 44 additional questions and many additional subparts, is to be sent to a sample of 1 in 6 households. The questionnaires are first mailed to each respondent. A response rate of about 78 percent is expected. Census Bureau employees in the field then call or visit the households that did not return their forms in an attempt to collect information on everyone in the country.

The forms that are returned are then checked to identify those that are filled out incorrectly or incompletely. The Bureau will first try to call respondents to correct the errors discovered; if this fails, an enumerator may visit the respondent.

In the 1980 census, about 20 percent of the short forms and 45 percent of the long forms "failed edit," and required follow-up. These figures appear to understate the actual proportion of questionnaires with errors, since accuracy standards had to be relaxed to permit the existing workforce to handle the large number of errors.

Response Rates

In 1975, Congress inserted into Title 13 of the United States Code (the Census Code) a new section (Section 195) specifically authorizing the Census Bureau to use statistical sampling whenever feasible in all areas of the census except the actual population count. This action recognized developments that had already taken place within the Census Bureau. Ironically, since this statute was passed, the statistical portions of the census design have not taken advantage of the potential for improvement in statistical design offered by the statute. The 1970 design used three different forms, each with a different length and sampling rate. In 1980, two forms were used, but the sampling rate for the long form was varied to match the population densities of the areas surveyed. For 1990, the Bureau has proposed a single long form, using a sample with a constant rate of 1 in 6 households.

During the same period, response rates have steadily declined. In 1970, the response to mailed questionnaires was 88 percent for the short form and 83 percent for the long and very long forms combined. In 1980, the mail response for the short form dropped to 82 percent. The Bureau has recently projected a mail response rate of 78 percent for 1990. We are concerned about this trend. There is some indication from recent research that the public is more concerned about privacy, less sanguine about surveys, and more suspicious of government than it was in 1970. But in its proposed dress rehearsal the Bureau has not reduced the burden or the number of sensitive questions as a means of improving response.

We believe that the length of the questionnaires and the sensitivity of some questions may contribute to respondent resistance. Some research has indicated that a questionnaire similar to the one under review was found to be complicated and "overwhelming" by respondents, while an alternative was described as simple and "easy to answer." It has also shown that some minority groups were offended by questions they considered an "invasion of privacy" and unrelated to a "population count." Many of these individuals could see no rationale for the extraneous questions unless the answers were to be turned over to welfare agencies or other authorities, and thus scoffed at assurances of confidentiality. (See References 1, 2, 3, and 4.) This research strongly suggests that counting the population in large cities is complicated by suspicions engendered by questions not related to the population count.

Another consequence of high rates of nonresponse and edit failure is the enormous workforce of enumerators required to visit millions of households and collect information in person. For the 1990 census, the Bureau estimates that over 300,000 enumerators will be needed. The cost of such a workforce makes up a large part of the budget for the census. The problems of adequately training and managing such a workforce are significant. Taking steps to increase the response rate for the census would reduce the number of enumerators needed and allow those employed to focus more on counting and collecting data on those groups traditionally the most difficult to enumerate.

The basic strategy underlying a mail-out census is sound--it is best to let the population enumerate itself as much as possible. Some respondent errors are inevitable, but the census short form must be as simple and as inoffensive as possible to minimize error. It is important to remember that the primary purpose of the census is to provide an accurate count of the population of the Nation.

The decennial census also provides a unique opportunity for a large sample study to provide reliable estimates of population characteristics that are used by many programs at all levels of government. These data are used by public officials and by both public and private researchers. It is important for these data to be accurate in order to have practical utility. It is also important that the sample size and design do not compromise the primary objective of the census--obtaining an accurate population count.

Improvements to be Made

In order to assure a successful 1990 census, the Census Bureau should make a number of changes aimed at improving response. Although there are many such possibilities for improving the content and design, we believe Census should focus on three areas where substantial improvements can be made in time for a realistic dress rehearsal in 1988.

1. Ask selected housing questions only on the long form.

We believe 7 of the 10 housing questions proposed should be asked only on the long form. These questions are the following:

H3: How many rooms do you have in this house or apartment? Do NOT count bathrooms, porches, balconies, foyers, halls, or half-rooms.

H4: Do you have complete plumbing facilities in this house or apartment; that is, 1) hot and cold piped water, 2) a flush toilet, and 3) a bathtub or shower?

H5: Is this house or apartment part of a condominium?

H6a: Is this house on ten or more acres?

b: Is there a business (such as a store or barber shop) or a medical office on this property?

H7: Do you have a telephone in this house or apartment?

H9: Answer only if you OWN OR ARE BUYING this house or apartment--
What is the value of this property; that is, how much do you think this house and lot or condominium unit would sell for if it were for sale?

H10a: Answer only if you PAY RENT for this house or apartment--
What is the monthly rent?

b: Does the monthly rent include any meals?

In addition, the telephone number itself (H7) should be asked on the back of the long or short form.

The long form sample will generally be adequate to meet the accuracy requirements for these data. The Department of Housing and Urban Development commented on such a modification in correspondence to our public docket, indicating that the Department does not need these questions asked of 100 percent of households for purposes of Federal housing programs. Furthermore, we have received comments in our public docket describing needs for these data; however, most commenters expressed concern about outright deletion of these items from the census. Based on these descriptions of user needs, we do not object to retaining these questions on the long form. Undoubtedly there are data users who would like to retain these questions on the short form in order to collect data from 100 percent of households. However, careful sampling methods should alleviate most of these user concerns. In order to assure that the 1990 census fulfills its primary function of enumerating the population, it is necessary to balance some user requests against the potential improvement in response for the short form.

This idea is not a new one. The General Accounting Office (GAO) has repeatedly suggested removing housing questions from the short form. In a May 1986 report focusing on the short form, the GAO concluded that the 1990 short form:

> should be shorter and simpler than the 1980 short form.... The decennial short form questionaire should be limited to the basic population and housing questions needed to obtain an accurate population count. The 1980 short form contained household questions extraneous to the population count. (Reference 5, p. 1)

GAO found that needs for housing data from 100 percent of the households "have not been fully substantiated and evaluated before being included on the Census questionnaire," and that, furthermore, the Bureau had developed little information on the respondent burden and the literacy skills required to complete the questionnaire. (Reference 5, p. 25) The report further stated:

> that the housing questions increase the complexity of the questionnaire and tend to discourage response. In addition, a shorter form may provide the Bureau with cost-saving options for its data automation decisions. In our opinion, the Bureau is missing a chance to send a more user-friendly, and easier-to-complete form to U.S. households which may increase the mail back rate. (Reference 5, p. 26)

2. Improve the sample design for the long form.

The short form will be sent to 100 percent of the Nation's households, and is most important for the Constitutionally-required enumeration. The long form, proposed by the Bureau to go to a sample of 1 in 6 (or a total of 16 million) households, contains a greater array of questions, including ones that respondents may consider more sensitive than those on the short form. We have concerns about the burden imposed by and accuracy of the data that are collected on the long form, and believe that the response rate can be improved and the burden on respondents reduced significantly. Such changes can be implemented, in part, by changing the sampling design from the proposed sample of 1 in 6 households. We discussed with Census staff, for example, a simple matrix sample design which had the potential to reduce burden, increase response rate, and improve statistical reliability. Given time constraints, however, we do not believe such a change can be developed in time for use in the dress rehearsal.

There are other sample designs that we believe will reduce the nonresponse and the error rates experienced in 1980. (For example, see Reference 6.) The Bureau should consider, for example, a variable rate sample, which would reduce the overall burden of the long form and thus help reduce the number of nonresponses and edit failures. In the past, this has been done; sampling rates have been varied in rural, suburban, and urban areas. This approach permits a high sampling rate to be used in less densely populated areas where it is needed, with a much lower rate for more highly populated areas where densities are typically 500 times greater. A sampling rate as low as 1 in 20 would provide precise estimates down to the level of individual blocks in central cities. Such a sampling rate in urban areas would also assure that 95 percent of these hard-to-count households would receive the simple, nonsensitive short form. This approach should reduce nonresponse and response errors in urban areas where they have been most significant.

3. Delete several questions.

Among the 44 additional questions included on the long form are questions that produce better data than others. That is, for some questions, errors in response are substantial. It has been found, for example, that many people answer incorrectly questions about how much their utility bills have been. The Department of Energy's Energy Information Administration realized this some time ago and now conducts a different type of survey to collect more accurate data on energy costs. People may consider other questions sensitive and may either refuse to answer or give inaccurate responses--the questions on rent and income, for example. In these cases and others like them, such response error may dwarf sampling error. Thus, only increased costs and inaccurate data are gained by a large sample of heavily biased responses.

With this in mind, we suggest that Census delete from the long form questions H16, H17, and H18. Census test results reported in 1979 showed that utility cost questions, in particular, produced responses that were exaggerated by about 50 percent. (See References 7 and 8.) These results came too late to remove the questions from the 1980 Census. The 1986 National Content Test showed that rewording the utility cost question reduced the bias by only 10 percentage points. Since the census form was already too long to assure reasonable error rates, inclusion on the 1990 Census of the biased utility questions meant that important questions on health insurance recommended by the Federal Agency Council had to be dropped.

There is no magic number of appropriate census questions that should be asked on the long or short forms, but each additional question raises the risk of nonresponse and errors. The Census Bureau's working principle in constructing the proposed questionnaires was to keep the length approximately the same as the 1980 Census. More work should be done to ensure that the response and error rates are better than in 1980. This can be done for the short form by removing questions, and leaving them only in the long form. For the long form, considering response error as well as random error provides a more useful criterion for determining content, and will clearly eliminate some questions from this lengthy questionnaire.

Resolution of Problems

In recent meetings with officials and senior staff of the Department of Commerce and Census Bureau, we discussed the problems and suggested modifications described above. We believe that these problems can be resolved quickly and that the dress rehearsal can proceed without delay. Our suggested modifications to bring the dress rehearsal into conformance with the principles of the Paperwork Reduction Act are summarized below:

1) Questions H3, H4, H5, H6, H7, H9, and H10 should be removed from the short form but retained on the long form, provided that a block for a contact telephone number is placed on the back cover of both short and long forms in lieu of the home telephone number requested in question H7.

2) a) The proposed sampling fraction of 1 in 6 can be maintained for the least populated census tracts, but can be reduced to produce samples of approximately the same size and precision for more heavily populated census tracts.

b) Alternatively, the sampling fraction may be varied further to improve efficiency with a maximum sampling rate not exceeding 1 in 2 for any jurisdiction or census tract and with a national sample size that does not exceed 10 million households.

3) Questions H16, H17, and H18 should be removed from the long form.

Revised questionnaires and sampling specifications for the three Dress Rehearsal sites should be submitted for review as soon as possible to permit the dress rehearsal to go forward on schedule. OMB will review such a resubmission expeditiously, and will include in such a review an opportunity for the public to comment.

We look forward to working with you and your staff in improving the quality of the 1990 census.

Sincerely,

Wendy Gramm

Wendy L. Gramm
Administrator for Information
and Regulatory Affairs

Enclosures

cc: Robert Ortner
John G. Keane
Katherine M. Bulow

References

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STATE OF NEBRASKA
DEPARTMENT OF ROADS

KAY A. ORR
GOVERNOR

R. H. HOGREFE
DIRECTOR-STATE ENGINEER

September 11, 1987

The Honorable Paul Sarbanes
Chairman, Joint Economic Committee
SD-G-01 Dirkson Senate Office Building
Washington, DC 20510

Dear Senator Sarbanes:

Re: Elimination of Transportation Questions
from the 1990 Census

It is the opinion of the Nebraska Department of Roads that the Office of Management and Budget proposal to eliminate selected questions from the 1990 Census questionnaire would have severe consequences to the planning process in urban areas.

The urban area Metropolitan Planning Organizations rely heavily on the transportation data extracted from the Census as it is the only available source of local work trip data. The Urban Transportation Planning Package is also an excellent source of vehicle occupancy, vehicle availability, transportation mode choice, travel time, and housing data. This data also becomes a key element in the development of the Department of Roads' computer traffic models. These models are a tool for the completion of the urban area transportation plan, an important document in assessing the needs and design of transportation facilities.

We would strongly urge that the subject questions not be eliminated from the 1990 Census.

Sincerely,

Thomas A. Wais

Thomas A. Wais
Deputy Director-Planning

TAW:DK:z

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NICHOLAS MAVROULES
6th District, Massachusetts

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Subcommittee on
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Minority Enterprise Development

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September 10, 1987

Wendy Gramm, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
1726 Jackson Place, N.W.
Washington, D.C. 20503

Dear Ms. Gramm:

It has come to my attention that the Office of Management and Budget has proposed the elimination of some 30 questions from the 1988 test questionnaire for the 1990 Census of Population and Housing. The elimination of several of these questions will have severe consequences for the State of Massachusetts in its planning for traffic and transportation improvement projects.

Although the majority of the questions deal with housing, there are some serious deletions proposed for transportation information. The proposed deletions which will adversely affect the transportation plans of Massachusetts are as follows:

1) Number of automobiles
2) Mode of transportation to work
3) Number of people sharing ride to work
4) Time of departure for work
5) Time required to get to work

This information is a critical part of the process of analyzing transportation projects throughout Massachusetts. It serves as a basic source of information regarding present and future transportation patterns and needs within the state. Elimination of this data would be detrimental not only to Massachusetts but to numerous other states as well.

As we look ahead to the 1990's we will be spending increasing amounts of time and money to analyze trends in traffic patterns and growth. The information that would be obtained from these questions is essential to the planning process. Should these questions be eliminated, alternative means of collecting the data will have to be devised. The costs of these additional surveys may actually surpass the potential savings realized by the elimination of these questions at this time.

I am extremely concerned with this potential shortsightedness, and would appreciate any information that you could give me regarding this matter. I look forward to hearing from you at your earliest convenience.

Sincerely,

Nicholas Mavroules
Member of Congress

City of
ARCATA

Wendy Gramm, Ph.D.
Administrator, Office of Information and Regulatory Affairs
U.S. Office of Management and Budget
1726 Jackson Place
Washington, D. C.

August 17, 1987

RE: Major cuts to 1990 Census content

Dear Ms. Gramm;

This letter presents the City of Arcata's concern about some of the proposed census questionnaire deletions. A number of the proposed deletions provide information essential to preparing and maintaining the City's planning documents in general and California's mandated affordable housing element in particular.

The following discussion briefly describes which proposed deletions concern us and how we use the data generated by those questions.

> 23-24: Data used to help document existing and project future transit needs and transportation modes for City public transit service planning.
>
> H6, H9, H10a, H20, H24, H25a-d, H28: Data used to help prepare Housing Element every five years, pursuant to California Government Code Section 65583 (Title 7, Division I, Chapter 3, Article 6). This document must include identification and analysis of current housing stock, housing trends, constraints to affordable housing, and housing need characteristics. In addition, some of this data is necessary for preparation of Community Development Block Grant applications.
>
> H20, H21: Data used to monitor and project building sizes and residential parking needs. This information is among that upon which Arcata's residential zoning standards and off-street parking requirements are based.

Census data is critical to good planning. It would be most unfortunate to delete those questions used by local entities to help meet the requirements of State and Federal Programs.

If you need more specific information to support retention of the proposed deletions described above, please do not hesitate to contact me.

page one of two

736 F Street - Arcata, California 95521 - 707 · 822 · 5951

Sincerely,

Thea Gast

Thea Gast
Mayor

cc: William P. Butz
Associate Director for Demographic Fields
Bureau of the Census

Chairman Mervyn M. Dymally
Subcommittee on Census & Population

Linda Gage
California Department of Finance
Population Research Unit

Senator Alan Cranston

Senator Pete Wilson

Representative Doug Bosco

DETROIT REGIONAL CENSUS ADVISORY COUNCIL
2300 CADILLAC TOWER ☐ DETROIT, MICHIGAN 48226 ☐ (313) 224-6380

August 10, 1987

Dr. Wendy Gramm, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC 20503

Dear Dr. Gramm:

The Detroit Regional Census Advisory Council is gravely concerned about the proposed reduction of questions for the 1990 Census. The Council, as indicated by the attached membership list, includes representatives of the major data producers and users in southeast Michigan.

We believe that this decision is ill-advised and should be reversed; the 1988 Dress Rehearsal questionnaire should be approved as submitted by the Bureau of the Census.

The Census Bureau has conducted a long and thorough process leading to development of this questionnaire. Federal government needs were identified through the Federal Agency Council, chaired by your office. Other governmental needs, as well as those of the general public, were ascertained through a long series of local public meetings beginning in 1984. Legislation and governmental regulations requiring use of census data have been reviewed at all levels. To meet these needs, the questions proposed for deletion must be included.

Let me cite just a few examples:

*The labor force questions provide data used to determine ratios for estimating unemployment levels and rates for sub-county areas. These are used in Job Training Partnership Act funding.

*The item on place of residence five years ago provides the measurement of migration: the patterns and characteristics of people moving from one place to another. A benchmark derived from these data is important for interpretating migration rates derived from matched income tax returns as used in population estimates. The erstwhile General Revenue Sharing program and others depend on these numbers.

*Rent and value provide the only socio-economic measure available for very small areas, including voting precincts. The fact that respondents may misstate value, estimating it too high, is unimportant because the item is used to compare one area to another, rather than for its absolute value.

*Vehicles available is critical for planning for public transit needs in an era of scarce resources.

The Decennial Census is the premier data collection activity of the nation. Because its constitutionally mandated function requires that every household and every resident be contacted, it is unique as a vehicle for collecting the variety of auxilliary information that is so important for the wide range of planning and decision making over a ten-year period.

For this reason, we do not believe that the Decennial Census should be viewed as a paperwork burden at all. Fifteen minutes, or even 45 minutes, of a household's time once in ten years is a minimal effort to spend for this very important result. If paperwork needs to be reduced, let us find other vehicles for that effort. The Decennial Census should be left alone.

We hope that, with the additional information that has been presented to you by both the Bureau of the Census and the data user community throughout the nation, you will see fit to reverse the decision made on July 24 and proceed forthwith to approve the questionnaire as submitted.

Sincerely,

Patricia C. Becker

Patricia C. Becker,
Chairperson

PCB:oo
Enclosure: Membership roster

cc: William P. Butz, Bureau of the Census
Senator Carl Levin
✓Senator Donald W. Reigle, Jr.
✓Senator Paul S. Sarbanes
Members of Congress: David E. Bonior
William S. Broomfield
Robert Carr
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John D. Dingell
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William D. Ford
Dennis M. Hertel
Sander M. Levin
Carl D. Pursell

Detroit Regional Census Advisory Council
Membership List

First Name	Last Name	Organization	City
Donna D.	Atkinson	Greater Detroit Area Health Council	Detroit
Patricia C.	Becker	City of Detroit Planning Department	Detroit
Peter	Bernard	Independent Consultant	Detroit
Claude J.	Brittingham	United Community Services	Detroit
Bill	Brown	Livingston County Planning Department	Howell
Barbara	Bryant	Market Opinion Research Co.	Detroit
Dr. Roy J.	Butz	Oakland Schools	Pontiac
Doris	Detwiler	Detroit Public Library	Detroit
Howard	Face	Michigan Bell Telephone Co.	Detroit
Denise	Flynn	Washtenaw County Metro Planning Comm.	Ann Arbor
James	Frederick	Michigan Cancer Foundation	Detroit
Judith	Goetz	Numbercrunchers	Detroit
Paul	Good	Southeast Michigan Council of Governments	Detroit
David	Hay	Oakland County Planning Division	Pontiac
Charles	Henry	Detroit Police Department	Detroit
Cornelius	Henry	Southeastern Michigan Transit Authority	Detroit
Don	Hoag	Detroit News	Detroit
Jeffrey	Jenks	Michigan Department of Civil Rights	Detroit
Mark	Kohl	Community Mental Health Services	Detroit
Gordon	Lambert	Oakland County Community Develop. Div.	Pontiac
Winston	Lang	NAACP--Detroit Branch	Detroit
Edward	Limoges	Southeast Michigan Council of Governments	Detroit
Von D.	Logan	Michigan Employment Security Commission	Detroit
Amy	Majeske	Wayne State University Computing Center	Detroit
Peter	Mallery	St. Clair County Planning Dept.	Port Huron
Ellen	McCarthy	Michigan Department of Civil Rights	Detroit
Donald	Morandini	Macomb County Planning Commission	Mt. Clemens
Jeffrey	Moyer	R. L. Polk Co.	Detroit
Frank	Nagy	Monroe County Planning Department	Monroe
Mark	Neithercut	MIMIC/CUS, Wayne State University	Detroit
Michael	Ponder	Pontiac School District	Pontiac
Barbara	Rennie	Detroit Urban League	Detroit
Kenneth	Riopelle	Sandy Corp.	Troy
Maurice	Roach	Wayne County Office of Economic Develop.	Detroit
Robyn	Rontal	Botsford General Hospital	Farm. Hills
Ronald	Ropke	United Foundation	Detroit
Gary	Sands	Development Research Associates, Inc.	Plymouth
William	Simmons	National Bank of Detroit	Troy
Sue	Smock	Wayne State Univ., Ctr. for Urban Studies	Detroit
Denny	Stavros	Detroit Public Schools	Detroit
John R.	Steiner	Greater Detroit Chamber of Commerce	Detroit
Thomasina	Tucker	City of Detroit Planning Department	Detroit
Horacio	Vargas	New Detroit, Inc.	Detroit
Susan	Wachsberg	Detroit Free Press	Detroit
Gary	Wilson	Michigan Chronicle	Detroit
Anne	Zald	Wayne State University, Purdy Library	Detroit
Saad E.	Zara	Detroit Edison Company	Detroit

Liaison Representatives:

Dwight	Dean	U.S. Bureau of the Census	Detroit
Robert C.	Graham	GLS Region V Planning and Development	Flint
Kurt	Metzger	U.S. Bureau of the Census	Detroit
Billie	Thon	Dept. of Housing and Urban Development	Detroit

080787

Paul X Dan

National
League
of
Cities

1301 Pennsylvania Avenue NW
Washington, D.C.
20004
(202) 626-3000

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Executive Director
Alan Beals

October 15, 1987

Ms. Wendy L. Gramm
Administrator for Information
  and Regulatory Affairs
Office of Management and Budget
Washington, DC   20503

Dear Ms. Gramm:

The National League of Cities is aware of three recommended changes in the questions and sampling size proposed for the 1988 Bureau of the Census Dress Rehearsal. We have some comments based on the modifications suggested in your letter dated September 16, 1987 to Katherine M. Bulow, Assistant Secretary for Administration of the Department of Commerce.

Underlying our immediate concerns on these proposed changes is the question of public comment. Since the beginning of the entire involvement of OMB with the Census questionnaire, the time allowed for public comment has been compressed. Your September 16 letter to Ms. Bulow indicated that OMB would include in its review of a revised dress rehearsal questionnaire and sampling speicifications to be submitted by the Commerce Department an opportunity for the public to comment.

As we understand the process for implementation of the 1988 dress rehearsal, comments would be needed by early October. This is the deadline that would keep the dress rehearsal on its schedule. The Federal Register, dated September 24, 1987 was the last public document on this issue that invited comments, no closing date was given.

We think that some of OMB's modifications, while initially appealing based on requirements of the Paperwork Reduction Act, may prove to be quite costly in the long run. We would urge that independent analyses of these changes be made so that the full impact of the proposals are known before it is too late to reassess those changes.

Past Presidents: **Tom Bradley,** Mayor, Los Angeles, California • **Ferd L. Harrison,** Mayor, Scotland Neck, North Carolina • **William H. Hudnut, III,** Mayor, Indianapolis, Indiana • **George Latimer,** Mayor, St. Paul, Minnesota • **Henry W. Maier,** Mayor, Milwaukee, Wisconsin • **Jessie M. Rattley,** Mayor, Newport News, Virginia • **John P. Rousakis,** Mayor, Savannah, Georgia • **Charles Royer,** Mayor, Seattle, Washington • **George V. Voinovich,** Mayor, Cleveland, Ohio • **Directors: Sidney J. Barthelemy,** Mayor, New Orleans, Louisiana • **Jose G. Benavidez,** Council Member, Sterling Heights, Michigan • **Richard L. Berkley,** Mayor, Kansas City, Missouri • **Maria A. Berriozabal,** Councilwoman, San Antonio, Texas • **Bob Bolen,** Mayor, Fort Worth, Texas • **Scott A. Burgess,** Executive Director, Alaska Municipal League • **Jon C. Burrell,** Executive Director, Maryland Municipal League • **Mary Davis,** Councilmember, Atlanta, Georgia • **Eugene Cox Dunwody,** Council President, Macon, Georgia • **Stacey A. Garner,** Mayor, Pulaski, Tennessee • **W. Wilson Goode,** Mayor, Philadelphia, Pennsylvania • **E. Arthur Gray,** Mayor, Port Jervis, New York • **Alec Hansen,** Executive Director, Montana League of Cities and Towns • **Marian Humes,** Alderman, Chicago, Illinois • **Karen Humphrey,** Councilmember, Fresno, California • **Steven E. Jeffrey,** Executive Director, Vermont League of Cities and Towns • **Robert E. Johnson,** Executive Director, North Dakota League of Cities • **Joseph A. Leafe,** Mayor, Norfolk, Virginia • **Roland A. Luedtke,** Mayor, Lincoln, Nebraska • **Charles Lyons,** Chairman, Board of Selectmen, Arlington, Massachusetts • **Arthur E. Morris,** Mayor, Lancaster, Pennsylvania • **Bob Overstreet,** Councilmember, Everett, Washington • **Grace Petersen,** Mayor, Pierre, South Dakota • **Joy Picus,** Council Member, Los Angeles, California • **Dana G. Rinehart,** Mayor, Columbus, Ohio • **Steven C. Roberts,** Alderman, St. Louis, Missouri • **Joseph A. Sweat,** Executive Director, Tennessee Municipal League • **Dan B. Theobald,** Mayor, Shelbyville, Indiana • **James Weatherby,** Executive Director, Association of Idaho Cities • **Douglas S. Wright,** Mayor, Topeka, Kansas

We have three concerns based on our initial review of your changes:

1. Deletion of utilities questions. This data is used by the Department of Housing and Urban Developemnt to determine the "gross rent" used in housing cost analysis. In particular, this data is most important in the calculation of the Fair Market Rent used in the Section 8 housing assistance program.

2. Moving seven of the ten housing questions from the short form to the long form. This change poses a serious problem of accurate statistical information for local data collectors. In particular, smaller governmental units that use block data will be harmed.

3. Reducing the national sampling size: In order to reduce the national sampling size, the sample size in more densely populated areas will have to be reduced. Again, this will harm the accuracy of local statistics.

This data is of extreme importance to local officials in performing municipal functions. Both rural and urban areas will likely be adversely affected in their planning and enumeration activities. We urge you to allow more time for expert review on the impact of the proposed changes.

Sincerely,

Alan Beals
Executive Director

cc: Senator Paul S. Sarbanes
Chairman
Joint Economic Committee
U.S. Senate

Rep. Mervyn M. Dymally
Chairman
Subcommittee on Census and Population
U.S. House of Representatives

William Butz
Associate Director for Demographic Fields
Bureau of Census

Old Colony Planning Council

Regional Planning Agency

John J. DeMarco
President
Daniel M. Crane
Executive Director

47 West Elm Street
Brockton, MA 02401
Tel.: 617-583-1833

September 10, 1987

Senator Paul Sarbanes, Chairman
Joint Economic Committee
U.S. Congress
Washington, D.C. 205015

Dear Senator Sarbanes:

I am writing to you on behalf of the Old Colony Planning Council and the Joint Transportation Committee to urge your favorable consideration for the travel to work information on the 1990 Census. The Council is the transportation planning organization for the Old Colony region which consists of fourteen member communities in Southeastern Massachusetts. In this capacity we are acutely aware of the importance of the journey-to-work data for transportation-related-planning activities.

The Old Colony Planning Council utilizes the journey-to-work data for the following applications:

- Regional Transportation Master Plan
- Transit Planning
- Corridor Studies
- Sub Area Concept Planning
- Downtown Circulation Studies
- Elderly and Handicapped Planning
- Impact Studies
- Intersection Analyses
- Special Studies

These are only a few of the list of applications that this important information is used in. Enclosed please find some of OCPC's documents developed using the Journey-to-work data.

Again, the Council urges your consideration to continue to provide this crucial data in the 1990 Census.

I would like to end by extending our thanks to you for your support and your many efforts in this regard.

Sincerely,

Pat Ciaramella
Transportation Planning Supervisor

PC/jes

enc.

FLORIDA DEPT OF TRANSPORTATION/S
BURNS BLDG RM 291
TALLAHASSEE FL 32301 10AM

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census

HONORABLE PAUL S SARBANES, CHAIRMAN, JOINT
ECONOMIC COMMITTEE
DIRKSEN SENATE OFFICE BLDG RM G01
WASHINGTON DC 20510

THIS IS A CONFIRMATION COPY OF A TELEGRAM ADDRESSED TO YOU:

DEAR MR SARBANES
FLORIDA SINCERELY REQUESTS YOUR ASSISTANCE T INSURE TRANSPORTATION INFORMATION WILL BE COLLECTED IN THE 1990 CENSUS. THE NATION NEEDS THIS INFORMATION TO SUPPORT TRANSPORTATION PLANNING AND TO ASSIST WITH DECISIONS EXTENDING WELL INTO THE 21ST CENTURY.

BECAUSE FLORIDA HAS ONE OF THE HIGHEST GROWTH RATES AND MIGRATIONS FROM OTHER STATES IS A MAJOR COMPONENT OF THIS NEW POPULATION, TRANSPORTATION CENSUS DATA IS ESSENTIAL AND WILL CONTINUE TO BE A CRITICAL COMPONENT OF INFORMED AND PROACTIVE TRANSPORTATION PLANNING.

PLEASE DO NOT DELETE TRANSPORTATION DATA FROM THE 1990 CENSUS.
SINCERELY

PATRICK J MCCUE DIRECTOR
TRANSPORTATION PLANNING AND PROGRAMMING
FLORIDA DEPT OF TRANSPORTATION
(PATRICK J MCCUE FLORIDA DEPT OF TRANSPORTATION BURNS BLDG RM 291
TALLAHASSEE FL 32301)
BURNS BLDG RM 291
TALLAHASSEE FL 32301

15:25 EST

MGMCOMP

TO REPLY BY MAILGRAM MESSAGE, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

Clu h

Minnesota
Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Office of Commissioner
(612) 296-3000

September 10, 1987

The Honorable Paul S. Sarbanes
Chairman, Joint Economic Committee
SD-G01
Washington, D.C. 20510

In reply refer to: 1990 Census

Dear Chairman Sarbanes:

We are extremely concerned with the proposal to eliminate questions from the 1990 Census pertaining to journey-to-work and vehicle ownerships and availability; these data are essential components of Minnesota's transportation planning and analysis efforts.

The Metropolitan Planning Organizations (MPOs) rely upon Census data for development of their multi-modal long range transportation plans and the analysis necessary for the management of the existing transportation systems. The MPOs are currently preparing to cooperate with the Census Bureau by providing employment location data which will increase the accuracy of coding the journey-to-work questions.

The Census is the most cost-effective method of collecting the essential transportation data; therefore, we urge you to take whatever action is necessary to retain the transportation questions in the 1990 Census.

Sincerely,

LEONARD W. LEVINE
Commissioner

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SECRETARY-TREASURER

September 10, 1987

The Honorable Paul S. Sarbanes
Chairman, Joint Economic Committee
SD-G01
Washington, DC 20510

Dear Senator Sarbanes:

The Texas Turnpike Authority implores you to consider the importance of future statistical analyses to the long-range, strategic planning of our nation's transportation system through the Bureau of Census data bank.

These data provided in large part from the Bureau of the Census are absolutely essential to this planning process--in both the long and short term. There cannot possibly be any savings by deleting those questions pertaining to the acquisition of needed information. The data required will have to be obtained somehow. The Census is the answer! There is no alternative source within the means of many state and local agencies.

Please do whatever your office and position will allow to ensure the future availability of these data.

On the tollroad side of the transportation picture, the journey-to-work series is extremely important. Your assistance in maintaining this valuable source cannot be overestimated.

Best regards,

Bob Neely
Executive Director

ch
pc: Board of Directors

Paul
[illegible]

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

SEP [illegible] 1987

Honorable Jeff Bingaman
United States Senate
Washington, D.C. 20510

Dear Senator Bingaman:

I am enclosing responses to the questions you asked following the hearings of the Joint Economic Committee on August 7, 1987. These questions were included in the August 14th letter I received from Senator Sarbanes.

I am happy to be of assistance to the Joint Economic Committee in its review of the plans for the 1990 Census. If I can provide further information, please let me know.

Sincerely,

Wendy Gramm

Wendy L. Gramm
Administrator for Information
and Regulatory Affairs

Enclosure

Responses to Questions Asked by Senator Jeff Bingaman

1. **Why did OMB decide to cut the supplementary questions asked on Indian Reservations in 1980 and not scheduled for inclusion in the 1990 census?**

OMB did not cut the supplementary questionnaire for American Indian Reservations. The Census Bureau has not included such a questionnaire in any proposals or plans for the 1990 census that it has submitted to OMB. In the fall of 1985 the Federal Agency Council (FAC) for the 1990 census asked the Bureau of the Census if it were planning a supplementary questionnaire for American Indian Reservations. Initially, the Bureau replied that it was planning a supplementary questionnaire, but later, in December 1985, it informed the FAC that its plans did not include such a questionnaire.

2. **What effect will the reductions that are being considered have on groups like Native Americans who are a small proportion of the population?**

   Will you still be able to issue a report on the social and economic status of the Native American population?

The 1990 census will contain a question on race that separately identifies American Indians, Eskimos, and Aleuts, and for American Indians asks the name of their enrolled or principal tribe. This question will be on the short-form questionnaire and will thus be asked for every person living in the United States. With this identifying information, the Census Bureau will be able to tabulate all census data separately for these three Native American groups and thus to report on their social and economic status.

Following the 1980 census, the Bureau of the Census published two special reports on American Indians, Eskimos, and Aleuts on Identified Reservations and in the Historic Areas of Oklahoma, in November 1985 and January 1986. These reports were based on data collected in a supplementary questionnaire that went to all reservation and historic area households that were not included in the regular 1980 census sample -- that is, households that did not receive the regular census long form. The supplementary questionnaire collected additional data on the characteristics of American Indian households on reservations and in historical areas and on various government programs that serve these households.

These data would not be available from the 1990 census without the supplementary questionnaire. However, even in the 1980 census, the long delay in publishing the data unfortunately diminished their usefulness for many purposes.

STATE of INDIANA

INDIANA DEPARTMENT OF HIGHWAYS
100 North Senate Avenue
Indianapolis, Indiana 46204-2249

INDIANAPOLIS

OFFICE OF THE DIRECTOR
Room 1101, State Office Building
317-232-5533

September 9, 1987

The Honorable Paul S. Sarbanes
Chairman, Joint Economic Committee
SD-G01
Washington, D.C. 20510

Dear Chairman Sarbanes:

It has recently come to my attention that several transportation-related questions are proposed for deletion from the 1990 Census. These questions, which deal with travel mode and time information for journey-to-work trips, are important to the transportation planning process in Indiana. The questions targeted for deletion describe travel characteristics between residential and employment zones and permit better analysis of emerging problems, such as suburban traffic congestion. The use of the United States Census in providing a uniform data base for transportation planning has become of great importance to the state and urban area planning agencies.

I hope the Census Bureau is aware of the need to provide this valuable information to state and local governments and retains these questions in the 1990 Census.

Sincerely,

John P. Isenbarger
FOR Director

JPI:DEF:SCS:nh

census

STATE OF MAINE
DEPARTMENT OF TRANSPORTATION
TRANSPORTATION BUILDING
STATE HOUSE STATION 16 AUGUSTA, MAINE 04333

mdot

DANA F. CONNORS
Commissioner

September 9, 1987

The Honorable Paul S. Sarbanes
Chairman, Joint Economic Committee
SD-G01
Washington, D. C. 20510

Dear Mr. Sarbanes:

The Maine Department of Transportation is very concerned that questions on journey-to-work, vehicle ownership and vehicle availability are in danger of being dropped from the next census. This information is indispensable in transportation planning in our urbanized areas.

During the 1960's, with the sophisticated modeling that we did, journey-to-work information was obtained from costly home interviews. This process, because of its expense, was dropped in favor of more streamlined procedures which depend on this decennial census information. To drop census information for economy would immediately cause us to revert to more costly methods of collecting such data, for a net increase in cost, not a decrease.

Urban transportation planning studies in the Portland and Lewiston-Auburn areas actively use this information. Federal urban planning regulations require analyses dependent on this information.

Alan Pisarski's recent study "Commuting in America" used this information extensively. It has pointed to a need to concentrate more on circumferential facilities in and around the suburbs of our larger cities for intensive commuting patterns, as opposed to the traditional CBD oriented travel. It is also expected that facilities supplementing the Interstate system will emerge in the suburbs and this information will be invaluable to appropriate major investment decisions.

Cost allocation also depends on a valid description of the vehicle fleet. Such information will help assure that user taxes are fair and equitable.

For the foregoing reasons, the Maine Department of Transportation respectfully requests retention of this important census information.

Sincerely,

Dana F. Connors
Commissioner

DFC:GGP/jg

cc: Paul Minor

Wisconsin Department of Transportation

DIVISION OF PLANNING & BUDGET
P.O. Box 7913
Madison, WI 53707-7913

September 9, 1987

The Honorable Paul S. Sarbanes
Chairman, Joint Economic Committee
SD-601
Washington, D.C. 20510

Dear Chairman Sarbanes:

I am writing to express deep concern over the proposed deletion of the journey-to-work series of questions and the vehicle ownership question from the 1988 Dress Rehearsal and the 1990 Census questionnaire. I regard this deletion as shortsighted and costly.

We regularly use this travel to work and vehicle ownership information in our transportation planning and policy analysis. The questions proposed for deletion are invaluable in our highway and transit planning in metropolitan areas. This information is vital in understanding how metropolitan areas are developing and how the infrastructure is being utilized. Without this information, we will be forced to make uneducated decisions about the infrastructure in our metro areas.

I find the proposal of the Office of Management and Budget to drop questions on journey to work and vehicle ownership ironic since it comes at a time when President Reagan is leading a national council to deal with the condition of the nation's public works. Without this key information it will be very difficult to accurately determine the scope of demand that will be placed on the nation's transportation infrastructure. This country would find it much more difficult to make decisions worth billions of dollars only because of the effort to save some minor amount of money in administering the census.

If the cost of including these questions is the problem, a solution would be to take some money from each federal infrastructure grant program. I am sure you will find that the cost of administering these questions will be far out weighed by savings in accurately addressing the country's infrastructure needs.

I strongly urge you to maintain the collection of this vital information. Without this information, states and the nation as a whole will be forced to make uneducated decisions concerning the infrastructure. These infrastructure decisions will affect billions of dollars of public investment.

Sincerely,

Roger L. Schrantz, Administrator
Division of Planning and Budget

RLS/jj

NORTH DAKOTA STATE HIGHWAY DEPARTMENT

600 East Boulevard Avenue
Bismarck, North Dakota
58505-0700

NORTH DAKOTA
CENTENNIAL

George A. Sinner, Governor
Walter R. Hjelle, Commissioner
Ray Zink, Chief Engineer

September 9, 1987

The Honorable Paul S. Sarbanes
Chairman, Joint Economic Committee
SD-G01
Washington, DC 20510

Dear Mr. Sarbanes:

It has been reported by AASHTO that Office Management and Budget is considering deleting approximately 30 questions from the questionnaire submitted for approval in the 1988 dress rehearsal and subsequental 1990 census. Some of these questions proposed for deletion seriously affect highway and transportation planning activities and the subsequent selection of construction projects based on detailed planning analysis. The North Dakota State Highway Department would consider the deletion of these questions to be a very serious mistake.

In the 1960s the North Dakota State Highway Department did transportation studies for our four major urban areas. At that time we collected socioeconomic data and other transportation related information by the home interview survey. These surveys cost us up to $250,000 per urban area. As the modeling process proceeded into the 1970s a more efficient means of transportation planning in urban areas was to use the census information. We purchased from the Census Bureau for the three major urban areas of North Dakota the 1970 and 1980 Urban Transportation Planning Package. We were very satisfied with most of the information in that package. The elimination of the proposed questions on housing employment and journey to work would greatly compromise that package. As of right now we have no other source from which to obtain this information.

We request serious reconsideration of the proposed deletion of census information from the 1988 dress rehearsal questionnaire and the 1990 census questionnaire.

Sincerely,

Walter R Hjelle
Walter R. Hjelle
Highway Commissioner

JC/kk

National
Association of
Regional
Councils

1700 K St., N.W., Washington, D.C. 20006 • Area Code (202) 457-0710

RICHARD C. HARTMAN, Executive Director

September 8, 1987

The Honorable Paul S. Sarbanes
The Joint Economic Committee
SD-G01 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator:

The National Association of Regional Councils has mailed a joint letter of protest to OMB regarding that agency's proposed cuts to the Dress Rehearsal for the 1990 Census. This letter was signed by several other local government and planning organizations. Our membership has also responded with numerous letters of protest, including information as to specific uses for the data slated for elimination.

I am enclosing for the record a copy of the joint letter, as well as copies of selected letters from our membership.

We appreciate your efforts, and hope this information will be of assistance.

Sincerely,

Richard C. Hartman

Richard Hartman
Executive Director

STATE OF OKLAHOMA
DEPARTMENT OF
TRANSPORTATION
200 N. E. 21st Street
Oklahoma City, OK 73105-3204

September 8, 1987

The Honorable Paul S. Sarbanes
Chairman, Joint Economic Committee
SD-G01
Washington, D. C. 20510

Dear Mr. Sarbanes:

The Oklahoma Department of Transportation is concerned about the Office of Management and Budget proposal to delete some transportation-related data to be collected in the 1990 census. The proposed deletion would severely hamper our efforts to plan for the future transportation needs for the State of Oklahoma.

Specifically, the Department is concerned about the following proposed deletions:

Number of automobiles per household
Mode of transportation to work
Number of people sharing a ride to work
Time of departure for work
Time required to get to work
Value of Home

This data is vital to Oklahoma's travel demand forecasting process. This data is used in computing the number of trips that will be using our transportation network. In addition, Oklahoma is now addressing critical future transportation choices, such as continued expansion of our highway system or addition of alternative forms of mass transit, which are based in large part on this and other reliable socio-economic data collected by the census.

Collection of this data is also recommended since much of this data is not otherwise obtainable and significant changes in Oklahoma's demography make use of 1980 census data unreliable. For instance, between 1980 and 1986 Oklahoma experienced 9.2 percent growth, one of the largest percentages in the nation, and much of this growth occurred in suburban areas of the State's two largest cities. The 1980 census data would be an unreliable base for predicting future transportation needs with such significant growth throughout the State and unprecedented growth in suburban areas.

STATE TRANSPORTATION COMMISSION
CHAIRMAN - BOB R. BERRY, VICE CHAIRMAN - TRAVIS FREEMAN, SECRETARY - JOHN M. QUAM, MEMBERS - BARBARA BERRY, ROBERT L. HARRIS, GORDON MASTERS, JOHN O. SPARKS, SAMUEL J. VEAZEY, DIRECTOR - NEAL A. McCALEB

AN EQUAL OPPORTUNITY EMPLOYER

The Honorable Paul S. Sarbanes
September 8, 1987
Page 2

The Oklahoma Department of Transportation strongly recommends collection of the transportation-related data. Decisions concerning the future safe and efficient movement of people and goods depend on this data.

Sincerely,

Neal A. McCaleb

Neal A. McCaleb, P.E.
Director

NAM:fs

The Commonwealth of Massachusetts
Executive Office of Transportation and Construction
Department of Public Works
Office of the Commissioner
Ten Park Plaza, Boston 02116-3973

September 8, 1987

Sen. Paul Sarbanes, Chairman
Joint Economic Committee
SD-6-01 Dirksen Senate Office Bldg.
Washington, D.C. 20510

Dear Senator Sarbanes:

It has been brought to our attention that a number of questions related to the journey to work and one on the number of automobiles in a household have been proposed for elimination from the 1990 Census. Dropping of these questions will have considerable adverse effect on the ability of the states to plan for improvements to alleviate the increasing traffic congestion in urban areas.

The four questions related to the journey to work are indispensible to the development and promotion of means of travel alternative to the automobile. In many metropolitan areas here in Massachusetts and across the nation alternatives to additional roadway capacity are essential and integral parts of any program to reduce the growing traffic congestion. As for the number of automobiles in a household, it is a key element in making forecasts of the volume and characteristics of travel for which we plan. It also provides an estimate of the transit dependent population.

If this information is not available from the census, it will be necessary to turn to our own data collection programs. The expenditures of local, state, and federal funds for such efforts will overwhelm any cost reduction to the census. They will also produce poorer results. The many separate efforts across the country cannot be compared to the single uniform process directed by an experienced professional staff in the Census Bureau.

The availability of this data and the ability provided by the Census Bureau to produce tabulations by relatively small geographic areas such as census tract and block groups is essential to providing a basis view of the network of travel.

In fact, there is a need to expand this process out further into the fringes of the metropolitan area as the traffic congestion moves out to the suburbs and beyond.

We urge that the transportation questions be retained for the 1990 Census as essential items which can only be replaced at a much greater cost.

Sincerely,

Robert T. Tierney
Commissioner

BERKSHIRE COUNTY REGIONAL PLANNING COMMISSION
10 FENN STREET, PITTSFIELD, MASSACHUSETTS 01201
TELEPHONE (413) 442-1521

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Director

September 8, 1987

Senator Paul Sarbanes, Chairman
Joint Economic Committee
U.S. Congress
Washington, DC 20515

RE: 1990 CENSUS - COLLECTION OF TRANSPORTATION DATA

Dear Senator Sarbanes:

This agency strongly supports the U.S. Census Bureau's continued collection of transportation-related statistics that comprise the so-called Urban Transportation Planning Package. This information is currently being considered for elimination from the 1990 federal census.

While budgetary constraints are apparently the primary motivation for reducing the scope of the decennial census, I would suggest that this is a case of the federal bureaucracy being "penny-wise and pound foolish". Not only is the collection of this data done most efficiently as part of a broader data collection effort, but many people, agencies and organizations (both public and private) use the data to provide important facilities, programs, and services as efficiently as possible.

Without this data, many independent and costly attempts to collect personal travel behavior data will no doubt be made for substate areas, with questionable results, or questionable decision-making will occur without reliable base information.

A substantial public benefit is realized from efforts that ensure that transportation, especially the work trip, is provided as efficiently as possible. Such efficiency is significantly derived from the availability of quality, reliable information. Further benefits are derived when this information is obtained and used in a uniform and consistent manner, something that is not likely with a variety of independent data collection efforts.

The usefulness, value and importance of the transportation data collected by the Census Bureau is well-documented in the following reports:

- Census Data and Urban Transportation Planning in the 1980's; Transportation Research Record 981; 1984.

- Transportation Planners' Guide to Using the 1980 Census; COMSIS Corporation for the U.S. DOT, FHWA; Jan. 1983.

Attached are the tables of contents from each report.

In terms of this agency's use of the transportation data from the Census, I offer the following examples:

1. Journey-to-work data from the 1970 Census was used to plan sensible and efficient public transit routes throughout the region. Consequently, the Berkshire Regional Transit Authority has consistently been among the top performing transit systems in Massachusetts.

2. Data from the 1980 Urban Transportation Planning Package was used in the inventory and analysis of CBD parking demand in the region's central city, Pittsfield. The ready availability of this data saved countless hours of guesswork regarding parking demand in the downtown area, and is part of the basis for which the City has been able to determine the need for new parking facilities.

3. We have made this information available to developers and/or their consultants who have used the data as a basis for estimating trip distributions and traffic flows for their proposed projects.

4. Previous energy crisis planning activities considered transportation data from the decennial census. There will, no doubt, be future energy crises and local, state and federal responses will require critical decisions based on reliable travel characteristics, just as they were in the past.

In conclusion, I would like to emphasize that the transportation data collected in the decennial census is an important component of the census products that are made available and I urge you to support adequate funding to the Census Bureau for the collection of this data.

Sincerely,

Karl Hekler

Karl Hekler
Director

GAR/db

Enclosure

cc: Dr. Wendy Lee Gramm, Admin., Office of Information & Regulatory Affairs
Representative Mervyn Dymally, Chrm., Subcommittee on Census & Population
Representative Silvio O. Conte

Special Libraries Association

1700 Eighteenth Street, N.W.
Washington, D.C. 20009
202/234-4700

September 8, 1987

The Honorable Paul S. Sarbanes
Chairman
Joint Economic Committee
Washington, D.C. 20510

Dear Senator Sarbanes:

On behalf of the Special Libraries Association, I appreciate this opportunity to discuss the proposed elimination of a number of questions from the 1990 decennial census.

The Special Libraries Association is an international organization of more than 12,500 librarians, information managers, and brokers. Special libraries serve industry, business, research, educational and technical agencies, government, special departments of public and university libraries, newspapers, museums and other organizations, both in the for-profit and not-for-profit sectors requiring specialized information. The Association and its members are concerned with the advancement and improvement of communications and the dissemination and ultimate use of information and knowledge for the general welfare of all users.

Since 1790 when Thomas Jefferson directed the first decennial census, pertinent and relevant information about the trends and activities of our nation has been gathered and disseminated by the Bureau of the Census. The information to be collected in the 1990 census is important not only to those of us in the library/information field, but will be used to reapportion seats in the House of Representatives, redistrict other governmental bodies, allocate billions of dollars in federal funding, and make government and private projects possible, from schools to shopping centers and, of course, libraries.

The members of SLA are concerned over any proposal to limit access to government information. In this case, we fear that there will be less information to actually access. By even discussing the possibility of eliminating, at this late date, approximately 30 questions from the 1988 Census "Dress Rehearsal" questionnaire, the Office of Management and Budget (OMB) through its Office of Information and Regulatory Affairs (OIRA) has opened itself up to a public outcry.

While OMB states this is not a formal position, it seems to us a bit late in the game to consider slashing over one-third of the questions. Discussions about the 1988 "Dress Rehearsal" have been going on since 1984, with active OMB involvement.

Certainly, under the provisions of the Paperwork Reduction Act of 1980, OMB is mandated to review any government proposal for the collection of information. But, we question the motives of OMB in drastically cutting back on the statistics gathered in such vital subject areas as housing, energy, transportation, unemployment, fertility, and population mobility. SLA members, as information collectors and disseminators, need this data. It is stored in one place, is easily accessible and should continue to be readily available.

We are aware that the "Dress Rehearsal" actually previews those questions which will appear on the 1990 Census form. If, in fact, many of the questions OMB disputes are eliminated on the "Dress Rehearsal," it is unlikely that they will be part of the 1990 Census. After years of discussions and input from those who use and need the data, SLA feels confident that the Bureau of the Census is capable of determining the type of information it should collect.

We do not think that there is sufficient time to properly examine the pros and cons of those questions in dispute. As concerned information professionals and private citizens, the members of SLA want to urge OMB to leave the proposed Census form as it is.

I would like to offer, for the record, a letter sent to the Administrator of OIRA by Dr. Toby Pearlstein, Chair of SLA's Transportation Division. Dr. Pearlstein briefly describes some of the transportation-related questions being considered for deletion and reasons for keeping them.

SLA appreciates this opportunity to share our views with the Joint Economic Committee on this issue which has such far-reaching implications.

Sincerely,

David R. Bender

David R. Bender, Ph.D
Executive Director

Attachment

DRB/vyh

STATE
TRANSPORTATION
LIBRARY

EOTC MDPW MBTA MASSPORT CTPS MTA MAC CARAVAN

TEN PARK PLAZA
BOSTON, MA. 02116
(617) 973-8000

11 August 1987

Ms. Wendy Gramm, Ph.D.
Administrator, Office of Information and Regulatory Affairs
U.S. Office of Management and Budget
1726 Jackson Place
Washington, D.C. 20503

Dear Dr. Gramm:

I am writing to you both as Chief Librarian & Archivist of the State Transportation Library of Massachusetts and as Chairman of the Transportation Division of the Special Libraries Association (representing more than 200 Transportation libraries in the U.S. and Canada). The purpose of this letter is to register an objection to OMB's proposed cuts to the 1990 Census content.

The constituency I represent is particularly concerned about the following proposed deletions:

H21 HOW MANY AUTOMOBILES, VANS AND TRUCKS OF ONE-TON CAPACITY OR LESS ARE KEPT AT HOME FOR USE BY MEMBERS OF YOUR HOUSEHOLD?

23A HOW DID THIS PERSON USUALLY GET TO WORK LAST WEEK? IF THE PERSON USUALLY USED MORE THAN ONE METHOD OF TRANSPORTATION DURING THE TRIP FILL THE CIRCLE OF THE ONE USED FOR MOST OF THE DISTANCE.

23B HOW MANY PEOPLE, INCLUDING THIS PERSON, USUALLY RODE TO WORK IN THE CAR, TRUCK OR VAN LAST WEEK?

24A WHAT TIME DID THIS PERSON USUALLY LEAVE FOR WORK LAST WEEK?

24B HOW MANY MINUTES DID IT USUALLY TAKE THIS PERSON TO GET FROM HOME TO WORK LAST WEEK?

The information gleaned from these questions represents some of the most significant data requested by the users of our libraries. And to the best of my knowledge, this information is not available from any other source. I will not go into the myriad of uses this information is put to since I am sure you will be receiving testimony to this effect but I would like to point out that this information is sought by a wide variety of persons including students, urban planners, regional planning agencies, transportation planners and traffic engineers, public administrators and policy makers, transportation brokerage groups (ride-share, subscription bus, van pools, etc.), real estate developers, consultants and many others.

While it may be true that there are questions in the Census that could be considered superfluous, these are not among them. On behalf of those I represent I strongly urge you to reconsider these deletions. The information you propose to eliminate is vital to the decision-making process at all levels of government and the Census represents an efficient and effective way to accumulate a broad base of transportation-related data which could not otherwise be made available.

If I or other members of the Transportation Division of the Special Libraries Association can be of further assistance to you in making your final decision, please do not hesitate to contact me.

Sincerely,

Toby Pearlstein

Dr. Toby Pearlstein
Chief Librarian & Archivist
Chair, SLA Transportation Division

cc:
Jean Thompson, Chair-Elect
David Bender, Exec. Dir. SLA

[illegible]

Department of Transportation and Development

P. O. BOX 94245
BATON ROUGE, LA. 70804-9245

Robert G. Graves
Secretary

Edwin W. Edwards
Governor

September 4, 1987

Senator Paul Sarbanes
Chairman, Joint Economic Committee
SD-G01 Dirkson Senate Office Building
Washington, D.C. 20510

Dear Senator Sarbanes:

It has been brought to my attention that the Office of Management and Budget has proposed eliminating thirty (30) questions from the questionnaire to be used in 1988 to test questions on the 1990 Census of Population and Housing. Several of the questions proposed to be eliminated gather information basic and essential to prudent transportation planning.

I know of no other existing source for this information and am convinced that no less expensive method could be devised other than to continue to gather it through the Census.

I am, therefore, opposed to the deletion of questions that relate to transportation.

Attached is a brief discussion of the manner in which the information gather through the five (5) questions I am concerned with is used.

I urge that the Bureau of the Census be required to continue to gather this information and that the questions not be deleted.

With kindest regards, I remain

Yours very truly,

ROBERT G. GRAVES

CB/lrp
Attachment

cc: On next page

cc: Senator J. Bennett Johnston, Jr.
Senator Russell B. Long
Representative Robert L. Livingston
Representative Lindy Boggs
Representative W. J. Tauzin
Representative Buddy Roemer
Representative Jerry Huckaby
Representative W. Henson Moore
Representative John B. Breaux
Representative Cathy Long

Current use of the transportation information projected to be deleted from the 1990 Census

1. Number of Automobiles

When disaggregated by household, this information helps to develop forecasts for highway and transit usage and demand estimates for new roadway and transit facilities. Such information is used to analyze travel by members of households with no access to automobiles and transit dependency by household, and, when combined with transportation handicapped information, it forms the basis of estimates of dial-a-ride service demand.

2. Mode of Transportation to Work

Modal information is important in assessing potential demand for transit services and in developing mode change facilities where autos and transit facilities meet. Mode of transportation data also helps assess transit dependency and is used to examine the impact of new developments on transit-dependent households and neighborhoods. In addition, it is used to identify where more or additional transit or roadway service is needed.

3. Number of People Sharing a Ride to Work

This information is essential to develop ridesharing programs and to analyze the feasibility of transit from point to point. This information will become increasingly important as we try to develop ways of reducing the number of vehicles on congested roads. A continuing data base of ridesharing information will help to evaluate how well our regional ridesharing programs are working.

4. Time of Departure for Work

This information has latent utility for the analysis of potential programs in flextime and variable working hours. The information is also important in minimizing impacts during major roadway construction or reconstruction, or for scheduling new transit services.

5. Time Required to Get to Work

This information is used in marketing analyses to determine the effect of time savings on trip mode choices. Gradually increasing trip times are an early warning that neighborhood transportation services are becoming overworked. It can also be used as a measure of the effectiveness of alternative highway and transit improvements which are being considered for implementation. Another use is to indicate how workers would view commuting to a potential new work site.

Multisystems, Inc.

1050 Massachusetts Avenue, Cambridge, Massachusetts 02138 617-864-5810

September 4, 1987

Senator Paul Sarbanes
Chairman, Joint Economic Committee
SD-6-01
Dirksen Senate Office Building
Washington, D.C. 20515

Dear Senator Sarbanes:

As a transportation planning firm, we regularly make use of U.S. Census Journey-to-Work data in our transportation studies. Such information is vital in assessing local, state, and Federal transportation problems and public transit needs.

Therefore, we strongly urge you to retain the following data items in the Census questionnaire:

- o number of autos per household
- o mode of transportaton to work
- o number of persons sharing a ride
- o time of departure
- o time required to get to work

As rush hour congestion increases in cities across the nation, effective public transit plans take on growing importance. Census provides the best source of data on current travel behavior and is thus crucial to the efforts of transportation planners addressing these issues.

Thank you for your consideration of this request.

Sincerely,

Daniel Fleishman
Transportation Analyst

0471Q

Segal/DiSarcina Associates, Inc.
Transportation Consultants
347 Congress Street
Boston, Massachusetts 02210-1222
617 423-0186

September 2, 1987

Senator Paul Sarbanes
Chairman
Joint Economic Committee
U.S. Senate
Washington, D.C. 20515

Dear Senator Sarbanes:

It is my understanding that the proposed questionnaire for the 1990 federal census may not include several transportation questions that have been included in past censuses. These include four questions in the population section (relating to mode to work, number of persons ridesharing, time of departure to work and time to get to work) and one question in the housing section (relating to number of automobiles per household).

As a transportation planning professional, I can only express my utmost dismay if questions such as these were to be eliminated. As you know, it is only possible to properly plan for future transportation needs if current information regarding travel patterns is known and is current. Data provided by questions such as these are invaluable in making determinations regarding future transportation issues.

While I can understand the need for simplification of the census forms, I can only urge you to support the continuation of questions which provide a base system of valuable information and data. I urge you to support the retention of these questions and hope that you recognize the need to maintain a base of current information and transportation needs.

Very truly yours,

Anthony J. DiSarcina, P.E.

Central Arkansas Library System
Public Library • 700 Louisiana Street • Little Rock, Arkansas 72201 • (501) 370-5954

August 31, 1987

The Honorable Paul Sarbanes
U.S. Senate
Dirkson Senate Office Building
Room 332
Washington, D.C. 20515

Dear Senator Sarbanes:

I read with alarm the news that the Office of Management and Budget is proposing to cut approximately one third of the questions on the 1990 census.

My understanding of how the questions have been developed is that the planning has been thorough and professional, with input from a broad cross section of census data users. I believe it will be false economy to potentially deprive millions of citizens of useful and used information under the guise of "Paperwork Reduction".

As the Director of the largest public library in Arkansas, I can not emphasize strongly enough the usefulness of the types of information proposed for the cuts. We serve businesses, (particularly small ones who cannot afford research staffs or libraries) city governments, and state government. Census information of all kinds is one of our most used and most useful resources.

We hope that you and the Joint Economic Committee will use your influence to stop this further erosion of information for the people.

Sincerely,

Rosemary S. Martin

Rosemary S. Martin
Director

RSM:bb

cc: Paul Manchester, Joint Economic Committee
Senator Pryor
Senator Bumpers
Representative Robinson

National Association of Housing Cooperatives

2501 M Street, N.W., Suite 451, Washington, D.C. 20037
(202) 887-0706

Executive Director
Herbert J. Levy

In Memoriam
Jerry Voorhis
Claremont, California

Chairman Emeritus
Charles Rappaport
Federation of New York Housing Cooperatives

President Emeritus
Roger Willcox
Norwalk, Connecticut

Chairman of the Board
Herbert H. Fisher
Chicago, Illinois

President
Marlene Cooper
Southeast Association of Housing Cooperatives

Executive Vice President
Terry Lewis
Ypsilanti, Michigan

Treasurer
Paul Fisher
Federation of New York Housing Cooperatives

Secretary
Walter Dodd
Corning, California

Immediate Past President
Lydia Joseph
California Association of Housing Cooperatives

Vice Presidents
Louise Harvey
California Association of Housing Cooperatives

Mary Ann Rothman
Council of New York Cooperatives

Ray McCawley
Eastern Cooperative Housing Organization

Barbara Loatman
Federation of New England Housing Cooperatives

Edward Bronstein
Federation of New York Housing Cooperatives

Johnnie Ferguson
Midwest Association of Housing Cooperatives

Murray Raphael
Mitchell-Lama Council

Rupert Thomas
Plains Association of Cooperative Housing

Janice Cromwell
Potomac Association of Housing Cooperatives

August 27, 1987

The Honorable Paul Sarbanes
United States Senate
Chair, Joint Economic Committee
SD 332
Dirksen Office Building
Washington, D.C. 20510

Dear Senator Sarbanes,

Prior to the 1980 Census, information regarding cooperative housing was separately reported. In 1980, data regarding cooperative housing was lumped together with data regarding condominiums. While cooperative housing and condominiums are both forms of shared ownership housing, they are not the same. A condominium, owner owns his unit outright and has common ownership of the condominium's common facilities. In a cooperative, a owner owns a share in a corporation which entitles him/her to occupy a unit. In a co-op, everything is owned in common. The Census represents the only source of information to locate what is going on with cooperative housing.

For the 1990 Census, I would like to request that information relating to cooperative housing be separated from information related to condominium housing.

Thank you for your consideration.

In cooperation,

Herbert J. Levy
Executive Director

1125 Fifteenth Street, N.W.
Washington, D.C. 20005

Mortgage Bankers Association of America

Warren Lasko
Executive Vice President
(202) 861-6501

August 27, 1987

Mr. Donald R. Arbuckle
Assistant Branch Chief
Office of Management and Budget
New Executive Office Building
Washington, D.C. 20503

Dear Mr. Arbuckle:

As representatives of an industry deeply involved in the financing of residential home purchases we are extremely concerned about current proposals by the Office of Management and Budget (OMB) to drastically reduce the amount of housing sector data to be collected in the 1990 decennial census, as well as the elimination of important follow on studies normally conducted by the Bureau of the Census. The recently offered proposals, which would virtually eliminate the housing sector portion of the 1990 decennial census questionnaire, drastically reduce the coverage of related population statistics, and eliminates the related Survey of Residential Finance (SRF) and the Components of Housing Inventory Change (CINCH), would constitute a major blow to the housing sector. The data collected by the Census Bureau surveys are of immense value in determining the quantity, nature and condition of the nation's housing stock. Cutting off these valuable sources of information would greatly impair efforts to evaluate the nation's housing environment.

The proposed cutbacks and terminations of data collection would affect the housing sector in three important ways. Elimination of the questions on the quantity and quality of the existing housing stock would make it extremely difficult, if not impossible, to accurately evaluate the status of the nation's housing. Not only would this seriously impair the ability of many Federal, state, and local agencies, departments and other authorities to implement a wide variety of existing housing programs, but it would render almost impossible efforts to formulate and implement a quantitatively based national housing policy. We believe that such a program is long overdue and vital to ensure the availability of adequate and affordable housing for all groups in all geographic regions of the country in the years ahead.

The OMB-proposed cutbacks would also seriously hinder efforts to determine the degree of housing affordability, which we believe to be an area of utmost national concern. Elimination of questions on mortgage payments, fire and hazard insurance, real estate taxes, cost of fuel and utilities, condominium and mobile home fees, and rent payments would seriously hamper efforts to determine the general cost of shelter, and in particular the cost of homeownership. This in turn would undermine the efforts of government, in conjunction with the private sector, to devise strategies to lessen the burden of providing shelter in the event that the degree of affordability were unusually high for any group or geographical region. These questions must not be eliminated if we are to retain our ability to accurately monitor the degree of housing affordability.

The third area of concern is the proposed elimination of data on the existence of and type of mortgage loan securing the residential property. These data, together with the statistics collected in the Survey of Residential Finance, are an indispensable source of information for the housing sector, both public and private, in regard to the functioning of the mortgage credit market. Information on the value of the home, size of the mortgage loan, whether there is a second mortgage loan as well, together with data on overall housing costs, provide an indication of the extent to which the nation's families are able to avail themselves of the services of the real estate finance sector, and how well that sector is servicing the needs of the home buying public.

The importance of the housing sector data which OMB proposes that the Census Bureau cease collecting certainly outweighs the minimal savings ($7 million) anticipated by this drastic reduction. Arguments that the users themselves either pay for the collection of the data or that the data, in principle, could be collected by interested parties from alternative sources are simply not valid. Many of the primary users of the data in question are themselves Federal government entities, e.g. the Department of Housing and Urban Development and the Federal Reserve Board. They do not have enough funds available to even partially cover the costs of this kind of data collection effort. Private sector users are also unable to cut back vital operations to fund the survey.

The suggestion of relying on alternative sources is just not plausible. Deriving the data in question from individual local sources would be enormously expensive and well beyond the scope of any of the housing sector data users group. And for some types of the data in question, the sources do not exist at the local level.

In the interest of maintaining a data base upon which national housing policy decisions can be rationally based and upon which the vital affordability and mortgage credit market efficiency issues can be adequately monitored, we urge that the proposed cutbacks in the 1990 decennial census be rescinded and that the important follow on surveys, the Survey of Residential Finance (SRF) and the Components of Housing Inventory Change (CINCH) be retained.

Sincerely,

Warren Lasko

WL/dps

CAMDEN COUNTY LIBRARY
ECHELON URBAN CENTER, LAUREL ROAD
VOORHEES, NEW JERSEY 08043
(609) 772-1636

NINA SYDNEY LADOF, DIRECTOR

August 26, 1987

Senator Paul Sarbanes
Room 332
Dirksen Senate Office Building
Washington, D.C. 20515

Dear Senator Sarbanes,

I read with dismay of the Office of Management and Budget's proposal to cut one-third of the questions on the 1990 census. The topics involved, including housing, transportation and employment are among those areas frequently requested by library users for business planning, proposal writing for non-profit agencies, and school assignments among other uses.

I urge the support for the Dress Rehearsal Questionnaire as proposed by the Bureau of the Census and the opposition of the OMB's proposed deletions.

Sincerely,

Karen R. Avenick
Supervisor, Reference Services

KRA/he

CC: Paul Manchester
American Library Association, Washington Office

CHARLES D. LAIDLAW

411 Wingate Road / Baltimore, Maryland 21210 / 301-235-0756

The Honorable Paul S. Sarbanes
United States Senate
332 Dirksen Building
Washington, D.C. 20510

22 August 1987

Dear Senator Sarbanes:

I am distressed to learn that OMB is considering dropping a number of useful and cost-effective questions on housing, migration, and transportation to work from the 1990 Census.

Those questions -- and the Census in general -- provide valuable ten-year "benchmark" data for public sector use, private market analysis, and business planning purposes.

OMB suggests that the questions being questioned are of marginal value, provide data of poor quality, and are available from other sources. That is not so since:

- Housing price/rent data helps to tell us about economic well being and market potentials
- Census data is of top quality considering data collection and statistical reliability challenges
- Most private and public data sources legitimately rely on Census ten-year "benchmark" data

OMB also asserts that there is no need for small-area data for small areas like Census Tracts, Census Blocks, and Zip Code Areas. Such small-area data is, in fact, essential to:

- Market potential analysis designed to pin-point strong and weak market areas
- Labor market analysis oriented toward identifying pools of available skills
- Economic well-being assessments designed to locate poverty locales and problem areas
- Health care analysis designed to find areas likely to harbor high disease incidence or risk
- Transportation planning intended to make maximum safe use of highways and transit systems

Small area Census data is essential and is much used by public organizations and the private sector. Doing away with small area "benchmark" data would drastically hamper public and private efforts to understand the nation's economy and its people.

Ten-year Census data is cost-effective -- less than fifty cents per person per year for the entire Census -- and remarkably accurate given the data gathering and statistical analysis challenges.

My "bottom-line" point: A relatively small marginal saving associated with removing a few Census questions can seriously damage an important and unique source of information.

Sincerely yours,

Charles D. Laidlaw

Copies to: Ms. Wendy Gramm / OMB
Mr. William Butz / Census

Enclosure: Letter to Ms. Wendy Gramm / OMB

URBAN-REGIONAL PLANNING/ECONOMICS CONSULTANT

CHARLES D. LAIDLAW

411 Wingate Road / Baltimore, Maryland 21210 / 301-235-0756

Ms. Wendy Gramm, Administrator
Office of Regulatory and Information Affairs
Office of Management and Budget
Washington, D.C. 20503

22 August 1987

Dear Ms. Gramm:

I am distressed to learn that OMB is considering removing a number of useful and cost-effective questions related to housing, migration, and transportation to work from the 1990 Census.

The Census is the best source of ten-year "benchmark" data for communities and small analysis areas. Please consider the following observations from someone who has been using Census data for more than thirty years in both public sector activities and private sector market analysis:

- Housing price/rent data -- along with income and household characteristics data -- is essential to pin-pointing differing areas of strong market potential or high poverty.
- Data on residence and time of move-in are essential elements in tracking the ever-elusive patterns of American population migration.
- Journey-to-work data -- in terms of mode and travel time -- are vital for transportation planning and can be translated into helpful market potential information.

Census data is the most consistent source of small area ten-year "benchmark" data on demographic and economic characteristics that I know of. Many private-sector providers of such data make legitimate use of Census "benchmark" data in producing more sophisticated market analysis data.

I make use of Census data virtually every week for a wide variety of market analysis and planning purposes. Perhaps some examples will help to make my point:

- Journey-to-work travel time data used to define the labor market around a proposed plant site
- Journey-to-work inter-county commuter flow data used to estimate freeway traffic demands
- Housing price/rent data used to help define unique retail market potential areas
- Residence five years ago and year moved in data used to help determine neighborhood stability

I won't try to overwhelm you with more examples. The point here is that they wouldn't exist if the Census didn't provide useful ten-year "benchmark" data.

Ten-year Census data is cost-effective -- less than fifty cents per person per year for the entire Census -- and remarkably accurate given the data gathering and statistical analysis challenges.

My "bottom-line" point: A relatively small marginal saving associated with removing a few Census questions can seriously damage an important and unique source of information.

Sincerely yours,

Charles D. Laidlaw

Charles D. Laidlaw

Copies to: Honorable Barbara A. Mikulski
Honorable Paul S. Sarbanes
Honorable Benjamin L. Cardin
Mr. William Butz / Census

Enclosures: Letters to Congress Members

Urban Information Associates, Inc.
Urban Economic Consultants

124 West Lafayette Avenue
Baltimore, Maryland 21217
Phone (301) 728-INFO

August 21, 1987

Hon. Paul S. Sarbanes
United States Senate
Senate Office Building
Washington, D.C. 20510

Dear Senator Sarbanes:

Enclosed is a copy of a letter to the Office of Management and Budget regarding its proposal to sharply curtail the questions to be included in the 1990 Census. OMB's proposal, if adopted, would seriously weaken our ability to formulate sound public policy and to make wise investments in housing, economic development, and transportation facilities. Failure to collect information on fertility and migration will seriously diminish the capacity of demographers and social scientists to trace patterns of population growth and change.

I want to express my appreciation to you for promptly holding oversight hearings on this matter. I look forward to hearing that this ill-conceived proposal on the part of OMB will be reversed.

Sincerely,

URBAN INFORMATION ASSOCIATES, INC.
Josef Nathanson, President

Enclosure

Urban Information Associates, Inc.
Urban Economic Consultants

124 West Lafayette Avenue
Baltimore, Maryland 21217
Phone (301) 728-INFO

August 21, 1987

Dr. Wendy Gramm, Associate Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
726 Jackson Place, N.W.
Washington, D.C. 20503

RE: 1990 Census Questionnaire

Dear Dr. Gramm:

The recent proposal by OMB to sharply curtail the questions on the 1990 Census questionnaire would seriously damage the information resources available for public and private decision-making during the 1990's.

This proposal is particularly dismaying, coming as is does at the end of a lengthy process of interagency consultation at the federal level, professional advice received from technical advisory committees, and extensive outreach at local public meetings throughout the nation. The resulting set of questions presented by the Census Bureau represents a fair compromise between the nation's information requirements and concern for the public's response burden.

Included among the questions marked for deletion are those pertaining to housing value and rent levels; labor force status; means of transportation to work; and migration patterns over a 5-year period. These and other data items are critically important to countless businesses, trade associations, research organizations and federal, state and local government agencies. In my capacity as a private economic development consultant, I have used products of the last three decennial censuses. From the standpoint of being able to analyze key indicators of community and economic development for sub-county areas, **there is simply no available alternative to the information provided by the census.**

A closer analysis of the value of the information to be collected by the Census Bureau should reveal that it is a cost-effective investment in sound decision-making.

Sincerely,

Josef Nathanson

Josef Nathanson, President

cc: Members of Congress, Maryland

American Planning Association
1776 Massachusetts Ave. NW
Washington, DC 20036
Phone 202 872 0611

August 20, 1987

The Honorable Paul S. Sarbanes
Chairman
Joint Economic Committee
SD-G01 Dirksen Senate Office Building
Washington, D.C. 20510

RE: **OMB's Proposal to Eliminate Items from the 1990 Census**

Dear Chairman Sarbanes:

This letter is being offered on behalf of the American Planning Association.

The American Planning Association is a national organization of 21,000 members, including public and private planners and elected and appointed officials at all levels of government as well as educators, students and interested citizens. Our members belong to 45 chapters covering every state and Congressional district. Many of our members use Census data on a daily basis.

APA was formed in 1978 when the American Institute of Planners, founded in 1917, and the American Society of Planning Officials, founded in 1934, consolidated. The Association's primary objective is to advance the art and science of planning for the improved development of the nation and its communities, states and regions. Within APA is the American Institute of Certified Planners which focuses on professional development. Members of AICP are distinguished by having met experience requirements and by having passed an examination on planning principles and practices.

APA is strongly opposed to the elimination of key population and housing data from the U.S. Census Bureau's 1988 dress rehearsal. We believe the proposal by the Office of Management and Budget (OMB) is shortsighted and fails to recognize the importance of Decennial Census data in decisionmaking in both the public and private sectors. Our statement, which was prepared by David J. Robertson, Housing & Human Services Planner, Dept. of Human Services and Public Safety, Metropolitan Washington Council of Governments, will focus on the policy and decisionmaking impacts of OMB's proposal.

In seeking to justify their actions, OMB suggested the deleted data did not serve important purposes or were not needed uniformly across the nation. In reality, the deleted data are essential to measure progress and develop new alternatives in many important policy areas.

OMB's decision has drawn widespread criticism from elected officials, academic institutions, community organizations and private industry. The Decennial Census is not an isolated statistical exercise; it is an ongoing policymaking tool. Census data impacts policies and programs in such diverse areas as housing, education, energy, transportation, child care, health care, and employment.

APA is particularly concerned about the impact of the proposed elimination of questions pertaining to housing. Approximately two-thirds of the 30 questions considered by OMB for elimination are directly linked to housing. The loss of these data would jeopardize the ability of both the public and private sectors to meet the still unmet challenge of a "decent home and a suitable living environment" mandated by the Housing Act of 1949.

If the OMB proposal is implemented, decisionmakers at every level will lose their most valuable tool: information.

The following four points illustrate how decisionmaking in housing programs would be affected:

> (1) The Section 8 Existing Housing Certificate program represents a major housing initiative that enables lower income households to obtain affordable and decent housing. A key element of this program is the periodic publication by the U.S. Department of Housing and Urban Development (HUD) of fair market rents for communities throughout the nation. The rental data proposed for elimination would hamper the ability of HUD and local housing agencies to update this information, upon which millions of dollars in housing assistance depend.
>
> (2) The housing affordability crisis affects many communities throughout the nation, both large and small. Federal funding for housing and community development programs has been cut by more than 70 percent since 1981 prompting many state and local governments to respond with a variety of local housing initiatives. These new initiatives, however, are jeopardized by the loss of important population, housing condition and utilization data, which are used to develop programs and monitor performance. If communities are expected to target scarce local resources, they need the comprehensive data produced by the Decennial Census.
>
> (3) Some of the information proposed for deletion would impact on the ability to administer current Federal programs, such as the Community Development Block Grant (CDBG) program. Data on overcrowding and the condition of the housing stock would be lost under the OMB proposal, which are important measures required by HUD for CDBG allocation.
>
> (4) New Federal legislation creating programs to aid the homeless will require each jurisdiction to adopt a Comprehensive Homeless Assistance Plan. How can local governments adequately plan to meet the housing needs of our nation's homeless if we are denied accurate data on our housing stock?

The data that the OMB is proposing to eliminate is also used for a variety of public policy decisionmaking for programs other than housing and community development:

- Local governments rely on data on the source of water, public sewers and plumbing facilities to plan for adequate water supplies and wastewater treatment facilities. Private utility companies also depend on utility, fuel and other housing data to make decisions on new plant construction and utility rates, involving investments of millions of dollars.

This nation cannot afford to be unprepared in the even of another energy crisis, due to a lack of data.

- State and local governments rely heavily on journey-to-work data for transportation planning. Key decisions on land development and traffic impact are made using this data which few, if any, local governments would be able to collect on their own. Multi-million dollar public highway and mass transit projects, along with private investment, hinge on the transportation data proposed for elimination.

- Funds allocated under the Job Training Partnership Act are largely based on labor force data also proposed for elimination. The effectiveness of local programs to train and employ unemployed workers would be jeopardized under the OMB plan.

In offering this proposal, the OMB suggested that data may not be needed at a national level, or that data may be more appropriately collected by a smaller sample, or in a more specific geographic area. APA views this approach as unwise and inefficient. Although the solutions to our nation's and communities' problems may require different approaches, the basic information needed to make those evaluations is the same. Local communities, particularly rural areas, may not have adequate resources to collect and analyze locally collected data. It is simply not cost effective to require thousands of communities to collect individually the same data collected by the Decennial Census on a national level.

Not only is OMB's decision ill-founded, but their process in reaching this decision has been unfair. OMB has chaired the Federal Agency Council for the 1990 Census since 1984 and has been involved in the preparation and review of proposed questions since that date. During all these months of deliberation between OMB, the Bureau of the Census, Federal agencies and data users, OMB failed to express any concern about the application of the Paperwork Reduction Act. Only on July 24, 1987, just before the Congressional recess, and with only two months for public comment, did OMB indicate its intention to eliminate key housing and other demographic data, citing their responsibility under the Paperwork Reduction Act. Although time remaining before the 1990 Census is growing short, it is imperative that the views of local communities, data users, and other concerned with the Census be heard before an irreversible decision is made.

Rather than attempt to alter the 1988 dress rehearsal at this late date, OMB should rely on the judgment of Census officials and staff. The 1988 dress rehearsal is the product of some of the most noted demographic and statistical experts in the nation, and reflects the input of data users in both the public and private sectors. OMB should respect the professional expertise that developed the 1988 Census dress rehearsal.

APA does not view the Decennial Census as just another government program. The Census was one of the first acts of our newly formed republic in 1790 and has enjoyed the support of the American people for almost 200 years. The American people respect the Census and comply because they understand the value of information in a democratic society. Census data enable government, industry, and private citizens to better understand our past, view our present, and to plan for our future. The time that it takes for respondents to complete the Census questionnaire is a wise investment that will enable the nation to plan for our needs as we approach the 21st century.

Senator Sarbanes, the American Planning Association is most appreciative of your conscientious inquiry into this important subject and your Committee and its staff are to be commended for holding this hearing on such short notice prior to the Congressional recess.

We hope that Congress and the Joint Economic Committee will do all within their power to see that the proposal by OMB to eliminate so many necessary items from the 1990 Census is not implemented.

Thank you for the opportunity to express the views of the American Planning Association on this subject. We would be delighted to assist the Committee to see that the Census is restored to being a compilation of data that is truly useful for public and private decisionmaking.

Sincerely,

Linda E. Hollis

Linda E. Hollis, AICP
Chair
National/State Policy
CoordinatingCommittee

Judy

Clarence "Du" Burns, Mayor

Office of the Mayor • City of Baltimore
250 City Hall, Baltimore, Maryland 21202
(301) 396-3100

Office of Washington Representative
2300 M Street, N.W., 4th Floor
Washington, D.C. 20037
Washington: 223-3020
Baltimore: (202) 955-9608

August 19, 1987

The Honorable Paul S. Sarbanes
Chairman
Joint Economic Committee
United States Senate
332 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Sarbanes:

Thank you for your concern over the proposal by the Office of Management and Budget to delete important questions relating to housing, transportation and employment from the 1990 Census, and for holding hearings on August 7 on this issue.

We belive that OMB's precipitous recommendations would, if carried out, severely restrict the statistical data available to decision makers in many fields and weaken their ability to assess and respond to citizen's needs.

We have informed Dr. Wendy Gramm, Administrator for Information and Regulatory Affairs at OMB of our concerns and attach a copy of our letter.

As always, we appreciate your attention and action in the public interest.

Sincerely,

Clarence Burns

Clarence "Du" Burns
Mayor

Attachment
CDB/rlb

August 18, 1987

Mr. William P. Butz
Associate Director for
Demographic Fields
Bureau of the Census
Washington, DC 20233

Dear Mr. Butz:

I want to join state and local officials throughout Maryland in voicing my opposition to OMB's proposal to eliminate many vital questions from the upcoming Census Bureau's Dress Rehearsal Questionnaire.

With the population in a constant state of flux, census information is often the only reliable information many organizations can obtain to help them make decisions -- on development, taxation, housing, transportation, and many other issues that affect their constituents.

The transitional nature of Americans, coupled with the speed of that transition, makes it absolutely essential for census data to be as comprehensive as possible. There is simply no other way to obtain these statistics.

I hope you will allow the census to remain the important source of information that it has been in the past.

Sincerely,

Barbara A. Mikulski

Barbara A. Mikulski
United States Senator

BAM:reh

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TOPIC
SUBTOPIC
PCD
TICKLER
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[illegible]

August 18, 1987

Mr. Donald R. Arbuckle
Office of Management & Budget
New Executive Office Building
Washington, DC 20503

Dear Mr. Arbuckle:

I want to join state and local officials throughout Maryland in voicing my opposition to OMB's proposal to eliminate many vital questions from the upcoming Census Bureau's Dress Rehearsal Questionnaire.

With the population in a constant state of flux, census information is often the only reliable information many organizations can obtain to help them make decisions -- on development, taxation, housing, transportation, and many other issues that affect their constituents.

The transitional nature of Americans, coupled with the speed of that transition, makes it absolutely essential for census data to be as comprehensive as possible. There is simply no other way to obtain these statistics.

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Sincerely,

Barbara A Mikulski

Barbara A. Mikulski
United States Senator

BAM:reh

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TOPIC ________
SUBTOPIC ________
PCD ________
TICKLER
SUBJECT
REFERRED TO ________
DUE DATE ________

The South Carolina State Library
1500 Senate Street
P.O. Box 11469
Columbia, South Carolina 29211

PHONE 734-8666

BETTY E. CALLAHAM
DIRECTOR

August 18, 1987

Senator Paul Sarbanes
332 Dirksen Senate Office Building
Washington, D. C. 20510-2002

Dear Senator Sarbanes:

Attached is a copy of a letter to Mr. Donald R. Arbuckle expressing concerns of the South Carolina State Library about the Office of Management and Budget's proposal to delete questions from the 1988 Census Dress Rehearsal.

I realize that you conducted a hearing on this matter on Thursday, August 6, 1987, but we were not aware of the problem at that time. Please add this letter to be included as written testimony of our concerns.

Sincerely yours,

Mary Toll

Mary Toll
Documents Librarian

MT/dw

Enclosure

The South Carolina State Library
1500 Senate Street
P.O. Box 11469
Columbia, South Carolina 29211

PHONE 734-8666

BETTY E. CALLAHAM
DIRECTOR

August 11, 1987

Mr. Donald R. Arbuckle
Office of Management and Budget
New Executive Office Building
17th Street Northwest
Washington, D.C. 20503

Dear Mr. Arbuckle:

The South Carolina State Library respectfully requests that the Office of Management and Budget retract its proposal to delete questions from the 1988 Census Dress Rehearsal and thus from the 1990 Census itself.

As a disseminator of census data, the State Library does not delve into the reasons for a person's need for information or the way the information will be used. However, we have indeed been asked for detailed housing and employment data at the small geographic levels that you deem unnecessary.

Staff members from the State Library have attended Census Bureau local planning sessions where private and public census data users evaluate past questions and offer new questions reflecting their needs. From this grass roots level, the Census Bureau and advisors ultimately decide the questions that constitute the Census. Intrusion by OMB at this late date negates user's needs and concerns.

We hope that you will respond favorably to data user's requests to leave Census questions as they presently exist.

Sincerely yours,

Betty E. Callaham
Director

BEC/dsw

EDNA L. DAVIS
President
FRED PIZZEDA
Executive Director

NORTHEAST OHIO AREAWIDE COORDINATING AGENCY
SERVING THE COUNTIES OF & MUNICIPALITIES WITHIN CUYAHOGA, GEAUGA, LAKE, LORAIN AND MEDIN

August 18, 1987

Mr. Donald R. Arbuckle
Assistant Chief, OIRA
Office of Management and Budget
Washington, D.C. 20503

AUG 20 REC'D

Dear Mr. Arbuckle:

RE: OMB PROPOSED CHANGES TO 1990 CENSUS QUESTIONNAIRE

The Northeast Ohio Areawide Coordinating Agency (NOACA) is a five-county planning agency located in Cleveland, Ohio. NOACA is designated to perform the following functions within the region:

- serve as the Metropolitan Planning Organization (MPO), recognized by the U.S. and Ohio Departments of Transportation, responsible for highway and transit planning;
- perform solid and hazardous waste, water and air quality continuing planning;
- conduct inter-governmental review of local, regional, and state applications for federal funds; and,
- act as a census data and planning information center supporting areawide programs meeting specific public and private sector needs.

By virtue of the above responsibilities and longevity that spans three censuses, we offer the following comments regarding OMB's proposed changes to the 1990 Census questionnaire.

We begin by noting that, as a transportation planning agency, one of the data files most critical to our efforts is the Urban Transportation Planning Package (UTPP)--a special cross tabulation of data from the decennial census. This file provides a unique snapshot of regional and local transportation demands and the characteristics of that demand, e.g., location of residence and work, means of transportation to work, income level, travel time to work, and others. The data are invaluable for updating our regional long range transportation plan (financially and institutionally supported by U.S. Department of Transportation) which, as its implemented, helps maximize the return to the tax dollars expended.

1501 EUCLID AVENUE · CLEVELAND, OHIO 44115 · (216) 241-2414

A point to note is that the UTPP is not solely a file of transportation data. The richness of the file comes with an understanding of the characteristics associated with the trip. In this way, some of the housing data (e.g., value of home, number of automobiles) become critical.

In addition, at the request of the Bureau of Census and the Ohio Department of Transportation, we are preparing material for and identifying major employment locations in anticipation of the 1990 Census. As we cooperatively undertake this type of work, we expect that the 1990 Census will provide the transportation planning process with meaningful, detailed data.

We might also note that as a metropolitan region that has experienced significant out-migration over the past 20 years, we clearly understand the importance of the census question, "residence five years ago." Only from this question do we obtain a clear understanding of the characteristics of regional in-and-out-migration.

The provision of small area data regarding water and sewer characteristics of housing units is crucial for water quality planning programs. We know of no other comprehensive source of such data. Additionally, other data proposed for deletion (e.g. rent levels) will deprive our region of information critical to development and human resource services planning, and will hamper efforts to target and monitor fair housing activities.

In sum, we suggest that OMB reconsider the entire issue of reducing the content of the decimal census questionnaire. As you must know, the questions proposed by the Bureau of the Census are the result of nationwide consultation with public and private sector data users. We would suggest the questionnaire format proposed by the Bureau be adopted for the 1990 Census.

Very truly yours,

NORTHEAST OHIO AREAWIDE COORDINATING AGENCY

Fred Pizzedaz
Executive Director

FP/jy/1177V

c: William P. Butz, Bureau of the Census
The Honorable David Pryor
The Honorable Mervyn M. Dymally
National Association of Regional Councils

THE COUNCIL
OF
THE CITY OF NEW YORK
CITY HALL
NEW YORK, N.Y. 10007

PETER F. VALLONE
VICE CHAIRMAN

TELEPHONE
212-566-5200

August 13, 1987

Donald R. Arbuckle, Assistant Branch Chief
Office of Management and Budget
726 Jackson Place NW, Room 3228
Washington, D.C. 20503

Dear Mr. Arbuckle:

The Office of Management and Budget has proposed deleting numerous questions from the 1990 Census.

This proposal would have a severe negative impact upon New York City's planning process. The decennial is the chief source of data for small geographic areas. Without the detailed data historically provided by this Census, the City would have great difficulty tracking trends in housing, transportation, population shifts, and unemployment. It would also be unable to profile individual neighborhoods to target federal and state funds.

We therefore request that OMB support a questionnaire comparable in scope to that used in the 1980 census rather than the reduced version proposed by your office.

Sincerely,

Peter F. Vallone

Peter F. Vallone
Vice Chairman and Majority Leader

Ruth Messinger
Councilwoman

RT/tms

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RECEIVED AUG 14 1987 SU

AUGUSTA-RICHMOND COUNTY
PLANNING COMMISSION
GEORGE A. PATTY
EXECUTIVE DIRECTOR
REV. C. S. HAMILTON
CHAIRMAN
525 TELFAIR STREET (11)
AUGUSTA, GEORGIA 30911
(404) 821-1796

August 12, 187

Mr. Donald Arbuckle
Office of Management and Budget
New Executive Office Building
726 Jackson Place, N. W.
Washington, D. C. 20503

Dear Mr. Arbuckle:

This letter is in protest to the July 24, 1987 OMB directive to the Bureau of the Census to delete almost half of the questions from the "dress rehearsal" forms for the 1990 Census. As the Census Bureau only had until August 7, 1987 to comply, there has been almost no time for local officials to find out about and respond to this directive which would seriously affect their abilities to assess their communities' needs. The block level statistics which are proposed for elimination are the foundation of neighborhood level planning data that enable local governments to fairly distribute scarce resources and to assemble competitive proposals for badly needed grants. Please keep this vital block level data in the 1990 Census and do not reduce them from a 100-percent basis to a sample basis. Local governments simply do not have the resources or ability to collect, analyze and publish these data. Thank you for your consideration.

Sincerely,

George A. Patty

George A. Patty
Executive Director

GAP/sw

cc: Willaim Butz
Alan Beals

CITY OF HAWTHORNE
PLANNING DEPARTMENT
"CITY OF GOOD NEIGHBORS"
4455 West 126th Street · Hawthorne, California 90250
(213) 970-7939

August 12, 1987

Donald Arbuckle
Office of Management and Budget
New Executive Building
726 Jackson Place, NW
Washington, D.C. 20503

Dear Mr. Arbuckle:

At a time when municipalities are trying to make the most efficient use of the dollar, it would be false economy to eliminate vital housing and population data from the 1990 Census Long Form, as is being proposed. Such data is the lifeblood of cities, for whom the expense of amassing such data themselves would be staggering.

The lack of this data would most significantly hamper the further development of cities as we know them and, additionally, would contribute to their eventual decline.

I feel approval of such a proposal would be dysfunctional, to say the least, to the commonweal.

Very truly,

Pat Brown
Director of Planning

PB:CG:cg

cc: NLC; Wm. Butz, Bureau of Census

52

ROBERT M. ISAAC
MAYOR

CITY OF COLORADO SPRINGS

August 12, 1987

Donald R. Arbuckle
Office of Management and Budget
New Executive Office Building
726 Jackson Place, N.W.
Washington, D.C. 20503

Dear Mr. Arbuckle:

With regard to the recent decision by the Office of Management and Budget (OMB) to delete approximately 30 questions from the 1988 Census Dress Rehearsal and the 1990 Census, as well as shift some questions from the 100 percent survey to the sample questionnaire received by one in six households, the City of Colorado Springs would like to express its objections and grave concerns and request that OMB reconsider these decisions.

After reviewing the suggested deletions and changes, it is our opinion that our community's ability to plan and develop programs and evaluate the results of these programs would be seriously and detrimentally affected. Attachment 1 specifically lists each data item suggested for deletion and outlines how that data item is used in our community. Briefly, these data items are used for:

- needs definition, planning, and program development
- development of grant applications and responses to Requests for Proposals for special funding that becomes available at the Federal and State levels, as well as through private foundations and resources
- evaluation by the City of program proposals made by agencies and institutions in the community
- evaluation of results of program implementation
- allocation of funds and targeting of neighborhoods for special programs for special population/housing characteristics
- capital improvements and special facilities programming and budgeting

CITY ADMINISTRATION BUILDING, SUITE 401 / 30 SO. NEVADA AVE. / PHONE 303-578-6600
MAILING ADDRESS: POST OFFICE BOX 1575 / COLORADO SPRINGS, COLORADO 80901

Some of the data recommended for deletion are critical to our efforts of population and employment forecasting by small areas, transportation and transit planning, housing program development, economic development programming, and energy planning and programming. The data is used in the Housing Assistance Plan (HAP), Community Development Block Grant (CDBG) programming, Urban Development Action Grant (UDAG) application and programming for Economic Development Assistance (EDA) funding.

This data is frequently used by both the public and private sectors of the community, including local government, social service/special service providers, such as the Community Action Agency, Energy Resource Center, the Urban League, and local school districts, as well as banking institutions, savings and loans, developers, businesses and new construction ventures.

This data is not available through other sources. Additionally, the City would be concerned about the consistency, reliability, objectivity, and comparability of such data were it available. The Census Bureau has provided the necessary level of methodological consistency, testing, documentation, and objectivity that serves to make the data useful for trend analysis and decision making involving funding allocations. This is particularly important in a fast-growing community such as Colorado Springs where unbiased baseline data is desirable as input for planning and financial decisions the community must make.

Additionally, the City strongly encourages maintenance of the current sample size for long form Census questionnaires. This one in six households sample has provided data that is adequately reflective of local conditions at the block group level and is heavily relied upon in the development of special programs targeted to meet specific housing and population needs. This sample size should only be reduced if the reliability of the data is not affected, a high level of confidence in the data results is maintained, and suppression of data does not occur on a more frequent basis than occurred for the 1980 Census.

The City of Colorado Springs is asking that OMB reconsider their determination on the deletion of certain data items and restore those that are critical to our community's continued efforts in planning and programming to ensure our citizenry's well-being. Additionally, it is our recommendation that no change be made in sampling size for the long form questionnaire if there will be a detrimental effect on reliability and availability of the data.

Sincerely,

Robert M. Isaac
Mayor

Attachment

cc: William F. Adams
Regional Director
Bureau of the Census
Denver, CO 80226

Francine Picoult
Office of Management & Budget
New Executive Office Building
726 Jackson Place, N.W.
Washington, D.C. 20503

American Planning Association
1313 East 60th Street
Chicago, IL 60637

Maurice Rahimi, Director
PPACG
27 E. Vermijo Street
Colorado Springs, CO 80903

William Butz
Associate Director
Demographic Fields
Bureau of the Census
Washington, D.C. 20233

Frank J. Donatelli, Assistant
to the President for
Intergovernmental Affairs
The White House
Washington, D.C. 20500

Attachment 1

POPULATION AND HOUSING

Item	Description	Comment
14.	Residence 5 years ago	Used as transience indicator & to calculate in-migration rate and rate of in-SMSA moves. Used for HAP ETR.
20.	Fertility	Used (infrequently) to forecast population. Used to forecast school age population potential by school districts. Also used for market research by private sector.
21b.	Hours worked last week	Used as descriptor of labor force & special program development by Industrial Training.
23-24.	Transportation/time to work	CRITICAL DATA ELEMENT for transportation and transit planning.
25-27.	Labor force	CRITICAL DATA ELEMENT for employment & population forecasting. Used by Industrial Training for program development.
31.	Work last year	Used as descriptor of labor force & special program development by Industrial Training.
H6.	Screener for house value	Used for HAP, CDBG program development and neighborhood designation. Used in planning for Urban Preservation Plan area. Used for funding allocation.
H7.	Telephone number	No objection to deletion.
H9.	Value of own home	See H6 above.
H10a.	Rent	CRITICAL DATA ELEMENT for housing planning & programming. Used in HAP and CDBG programming. Used by Housing Authority to determine fair market rent value. Used by private sector.

		investors, agencies considering subsidized construction. Used by many agencies for program development. Used for funding allocation.
H12.	Source of water	No objection to deletion.
H13.	Public sewer	Used for CDBG program development & neighborhood designation. Used for capital improvements allocation.
H15.	Fuel for heating home	Used by Energy Resource Center (ERC) for program development and funding allocation.
H16.	Heating equipment	Used by ERC for program development and funding allocation.
H17.	Fuel used for heating water	Used by various utility suppliers.
H18a-d.	Costs of utilities & fuels	Used in HAP and for CDBG and ERC programming and funding allocation. Used by Housing Authority for average utility costs.
H20.	Number of bedrooms	Used as overcrowded housing indicator. Used in HAP. Used by Housing Authority to determine fair market rent by size of unit. Used as indicator for HODAG.
H21.	Number of autos	Used in transportation planning. Used by private sector for marketing purposes.
H22.	Date moved in	See 14 above.
H23.	Real estate taxes	No objection to deletion.
H24.	Fire, hazard & flood insurance	No objection to deletion.
H25a-d.	Mortgage	Used in HAP and for housing planning, programming and funding allocation.
H26.	Junior mortgage	See above.

H27.	Condominium fee	No objection to deletion.
H28.	Mobile home fee	No objection to deletion.

STATE
TRANSPORTATION
LIBRARY

EOTC MDPW MBTA MASSPORT CTPS MTA MAC CARAVAN

TEN PARK PLAZA
BOSTON, MA 02116
(617) 973-8000

11 August 1987

Ms. Wendy Gramm, Ph.D.
Administrator, Office of Information and Regulatory Affairs
U.S. Office of Management and Budget
1726 Jackson Place
Washington, D.C. 20503

Dear Dr. Gramm:

I am writing to you both as Chief Librarian & Archivist of the State Transportation Library of Massachusetts and as Chairman of the Transportation Division of the Special Libraries Association (representing more than 200 Transportation libraries in the U.S. and Canada). The purpose of this letter is to register an objection to OMB's proposed cuts to the 1990 Census content.

The constituency I represent is particularly concerned about the following proposed deletions:

H21 HOW MANY AUTOMOBILES, VANS AND TRUCKS OF ONE-TON CAPACITY OR LESS ARE KEPT AT HOME FOR USE BY MEMBERS OF YOUR HOUSEHOLD?

23A HOW DID THIS PERSON USUALLY GET TO WORK LAST WEEK? IF THE PERSON USUALLY USED MORE THAN ONE METHOD OF TRANSPORTATION DURING THE TRIP FILL THE CIRCLE OF THE ONE USED FOR MOST OF THE DISTANCE.

23B HOW MANY PEOPLE, INCLUDING THIS PERSON, USUALLY RODE TO WORK IN THE CAR, TRUCK OR VAN LAST WEEK?

24A WHAT TIME DID THIS PERSON USUALLY LEAVE FOR WORK LAST WEEK?

24B HOW MANY MINUTES DID IT USUALLY TAKE THIS PERSON TO GET FROM HOME TO WORK LAST WEEK?

The information gleaned from these questions represents some of the most significant data requested by the users of our libraries. And to the best of my knowledge, this information is not available from any other source. I will not go into the myriad of uses this information is put to since I am sure you will be receiving testimony to this effect but I would like to point out that this information is sought by a wide variety of persons including students, urban planners, regional planning agencies, transportation planners and traffic engineers, public administrators and policy makers, transportation brokerage groups (ride-share, subscription bus, van pools, etc.), real estate developers, consultants and many others.

While it may be true that there are questions in the Census that could be considered superfluous, these are not among them. On behalf of those I represent I strongly urge you to reconsider these deletions. The information you propose to eliminate is vital to the decision-making process at all levels of government and the Census represents an efficient and effective way to accumulate a broad base of transportation-related data which could not otherwise be made available.

If I or other members of the Transportation Division of the Special Libraries Association can be of further assistance to you in making your final decision, please do not hesitate to contact me.

Sincerely,

Toby Pearlstein

Dr. Toby Pearlstein
Chief Librarian & Archivist
Chair, SLA Transportation Division

cc:
Jean Thompson, Chair-Elect
David Bender, Exec. Dir. SLA

Highway
Users Federation
FOR SAFETY AND MOBILITY

OFFICE OF THE PRESIDENT

August 11, 1987

The Honorable Paul S. Sarbanes
Chairman
Joint Economic Committee
SD-332 Dirksen Senate Office Bldg.
Washington DC 20510

Dear Senator Sarbanes:

You are to be commended for your prompt initiative in bringing the OMB proposal for severe cuts in the 1990 Census to public attention in a hearing on August 7. Two of my associates who attended the hearing reported back that there was very substantial opposition to the proposal from a wide cross section of public and private sector spokesmen.

As indicated in our correspondence to your office August 5, we are deeply concerned about the possible removal of all or nearly all transportation questions from the 1990 Census. Your prompt action clearly has given OMB reason to have second thoughts about their suggestion relative to the Census.

Your reference to the Federation's correspondence in your opening statement was appreciated.

Sincerely,

Lester P. Lamm

SC

KENTUCKY MUNICIPAL LEAGUE

President
Mayor William F. Taylor
First Vice President
Mayor William H. Goetz

Second Vice President
Mayor Jerry E. Abramson
Executive Director
Edwin L. Griffin, Jr., CAE

August 10, 1987

Ms. Cristy Bach
Special Assistant to the
President on Intergovernmental
Affairs
The White House
Old Executive Office Building
1600 Pennsylvania Ave.
Washington, DC 20500

Dear Cristy:

I have just learned of the directive last week by the U.S. Office of Management and Budget to delete nearly half of the proposed questions from the upcoming preliminary census forms. I would like to take this opportunity to share with you my particular concern with this action and encourage you to share with the appropriate officials, the impact of such a decision.

The information that would be deleted from the questionnaire and hence, unavailable from any other sources, is critically important for planning and management at the local level. It would have far-reaching effects that would go beyond hampering and could seriously undermine our ability to effectively and efficiently deliver services. This goal has been repeatedly stated as one of the Reagan administration's top objectives for local governments, "efficiency and effectiveness." Without the information necessary to determine not only trends, but the status quo, it is simply impossible for local officials to be responsive to the demands of their citizens and the expectations of the Administration.

The information is needed as planners deal with planning and zoning issues, as economic development directors entice the investment of corporations and manufacturing firms to local communities, by banking executives in consideration of expanding financial services, and in the multiplicity of other decisions that are made in every community in America. The local, state and federal governments need this information. The shortsightedness of this particular OMB proposal will hopefully be recognized by the White House and will be rectified before this opportunity is lost.

"CITIES UNITED FOR KENTUCKY'S FUTURE"

Page 2
Ms. Cristy Bach
August 10, 1987

Thank you for your interest in this concern and your assistance in rectifying this problem. Best regards.

Sincerely,

Ed

Edwin L. Griffin, Jr.
Executive Director

ELG/cs

bcc: Alan Beals
[redacted]
Rebecca Bennett Crow

MARYLAND
DEPARTMENT OF STATE PLANNING
301 W. PRESTON STREET
BALTIMORE, MARYLAND 21201-2365

WILLIAM DONALD SCHAEFER
GOVERNOR

CONSTANCE LIEDER
SECRETARY

August 10, 1987

Senator Paul Sarbanes
Dirksen Senate Office Building
Room 332
Washington, D.C. 20510

Dear Senator Sarbanes:

The Office of Management and Budget (OMB) is proposing severe curtailment of the subject content of the Census Bureau's 1988 Dress Rehearsal Questionnaire and, consequently, the 1990 Census of Population and Housing questionnaire.

State, local and municipal governments, as well as private sector users, rely heavily on many of the subject items that OMB proposes to delete or curtail: housing unit value and rent; utilities, energy, and related housing costs; migration; fertility; and commutation to work, to name a few.

The impact of stripping the Census of Population and Housing of its housing component is devastating. In Maryland, the State Data Center responds annually to over 5,000 requests for census data. Many of these requests are directly related to the housing characteristics that OMB proposes to eliminate. The absence of housing data in 1990 will affect residents of this State, not only in the census year, but throughout the decade of the Nineties.

One of the principal values of the Census is that it is a count, not a best guess, of what is happening in the real world. The information collected by the census is, in many cases, the basis on which we formulate our longterm programs and policies, and plan for the future development of the State.

The Census Bureau has asked that data users express their concerns in writing to OMB. I feel that a letter from you in support of the 1988 Dress Rehearsal Questionnaire is warranted.

Correspondence should be sent to:

Dr. Wendy Gramm,
Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
NEOB
17th Street between Penna. Ave. and H Street, N.W.
Washington, D.C. 20503

TELEPHONE: 301 225-4500
TTY for Deaf: 301-383-7555
OFFICE OF SECRETARY

Senator Sarbanes
August 10, 1987
Page 2.

Copies of correspondence should be sent to:

Maryland Department of State Planning
Room 1101
301 West Preston Street
Baltimore, Maryland 21201

Donald R. Arbuckle
Office of Management and Budget
NEOB
17th Street between Penna. Ave. and H Street, N.W.
Washington, D.C. 20503

Honorable Mervyn M. Dymally
Chairman, Subcommittee on Census and Population
Committee on Post Office and Civil Service
House of Representatives
Washington, D.C. 20515

and

William P. Butz
Associate Director for Demographic Fields
Bureau of the Census
Washington, D.C. 20233

Please note that all correspondence must be received by OMB before August 21, 1987.

If you have any questions, please do not hesitate to contact me or our Office of Planning Data, (301) 225-4450.

Sincerely,

Constance Lieder

Constance Lieder

CL/mm

OFFICE OF PLANNING AND BUDGET

JOE FRANK HARRIS
GOVERNOR

CLARK T. STEVENS
DIRECTOR

August 10, 1987

Honorable Paul Sarbanes, Chairman
Joint Economic Committee
G01 Dirkson Senate Office Building
Washington, D.C. 20510

Dear Chairman Sarbanes:

Enclosed is a copy of the response from Governor Joe Frank Harris to the proposed changes in the content of the 1990 Census of Population and Housing.

This is to request that Governor Harris' letter be included in the Record of Hearing held August 7, 1987, regarding the Office of Management and Budget's proposed deletions.

Thank you for your assistance.

Sincerely,

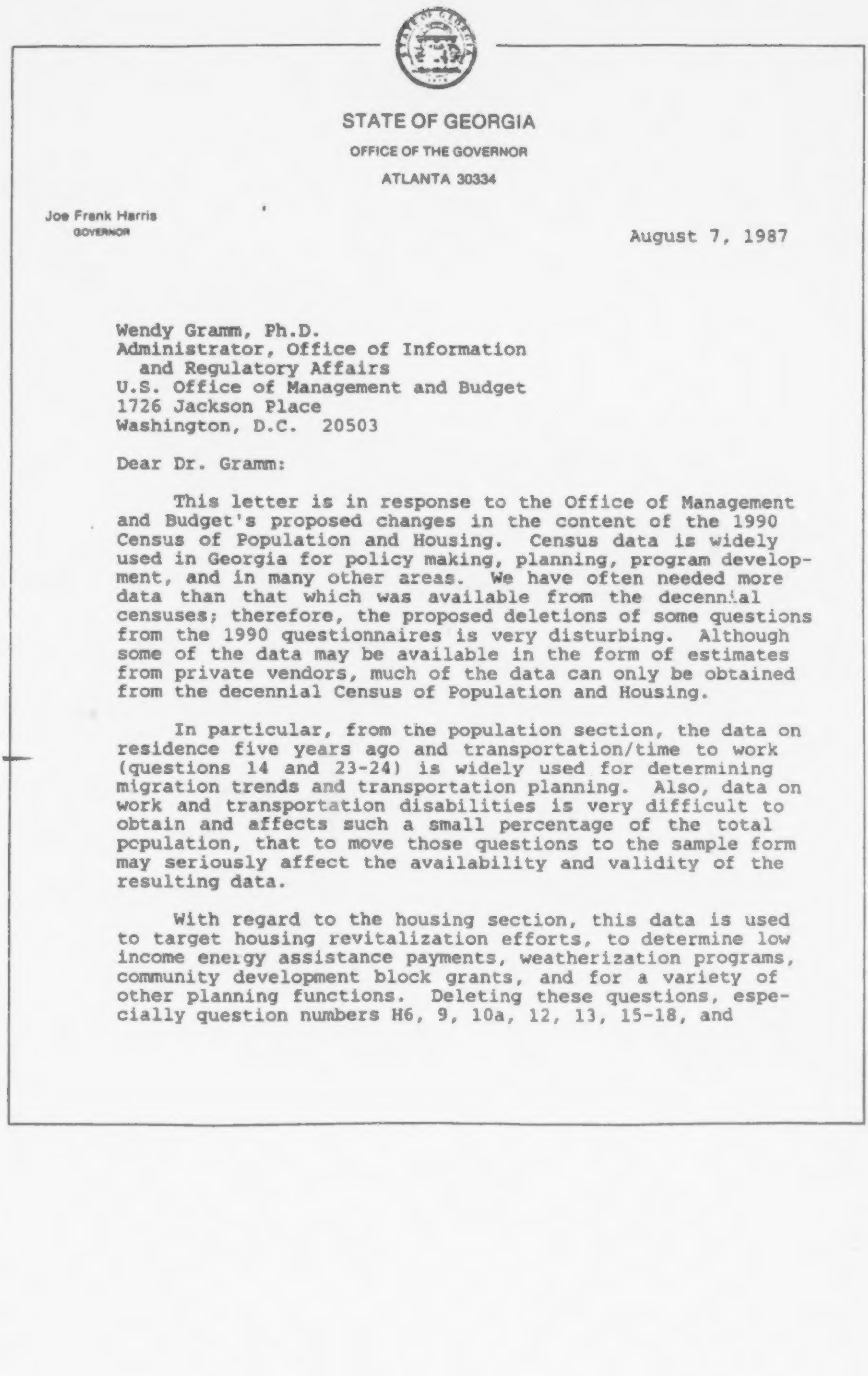
C. T. Stevens

Clark T. Stevens

CTS:epl

Enclosure

270 WASHINGTON ST., S.W. • ATLANTA, GEORGIA 30334



STATE OF GEORGIA
OFFICE OF THE GOVERNOR
ATLANTA 30334

Joe Frank Harris
GOVERNOR

August 7, 1987

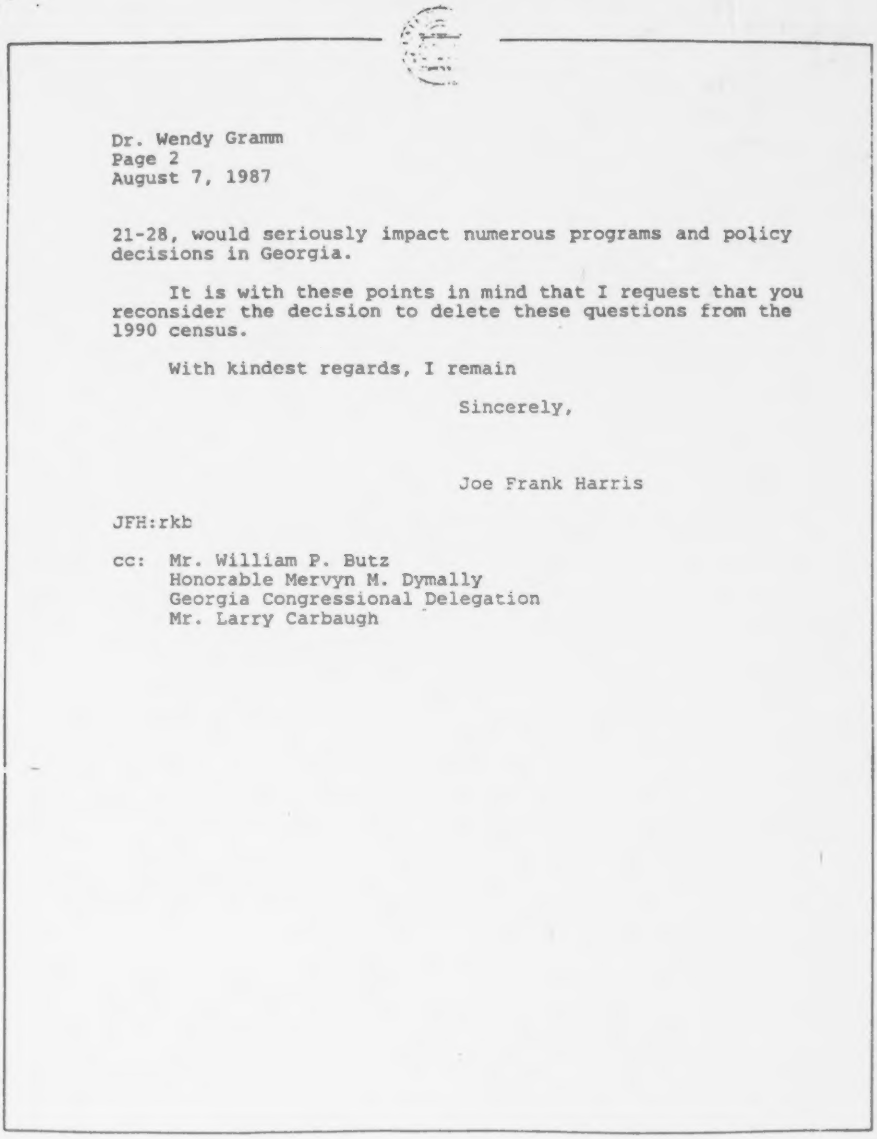
Wendy Gramm, Ph.D.
Administrator, Office of Information
and Regulatory Affairs
U.S. Office of Management and Budget
1726 Jackson Place
Washington, D.C. 20503

Dear Dr. Gramm:

This letter is in response to the Office of Management and Budget's proposed changes in the content of the 1990 Census of Population and Housing. Census data is widely used in Georgia for policy making, planning, program development, and in many other areas. We have often needed more data than that which was available from the decennial censuses; therefore, the proposed deletions of some questions from the 1990 questionnaires is very disturbing. Although some of the data may be available in the form of estimates from private vendors, much of the data can only be obtained from the decennial Census of Population and Housing.

In particular, from the population section, the data on residence five years ago and transportation/time to work (questions 14 and 23-24) is widely used for determining migration trends and transportation planning. Also, data on work and transportation disabilities is very difficult to obtain and affects such a small percentage of the total population, that to move those questions to the sample form may seriously affect the availability and validity of the resulting data.

With regard to the housing section, this data is used to target housing revitalization efforts, to determine low income energy assistance payments, weatherization programs, community development block grants, and for a variety of other planning functions. Deleting these questions, especially question numbers H6, 9, 10a, 12, 13, 15-18, and



Dr. Wendy Gramm
Page 2
August 7, 1987

21-28, would seriously impact numerous programs and policy decisions in Georgia.

It is with these points in mind that I request that you reconsider the decision to delete these questions from the 1990 census.

With kindest regards, I remain

Sincerely,

Joe Frank Harris

JFH:rkb

cc: Mr. William P. Butz
Honorable Mervyn M. Dymally
Georgia Congressional Delegation
Mr. Larry Carbaugh

American Demographics
Inc.

108 N. CAYUGA ST. ITHACA, NY 14850
P.O. BOX 68 ITHACA, NY 14851
607/273-6343

AMERICAN DEMOGRAPHICS MAGAZINE
AMERICAN DEMOGRAPHICS INSTITUTE
THE NUMBERS NEWS
CONSUMER MARKETS ABROAD

August 10, 1987

Senator Paul Sarbanes
Chairman, Joint Economic Committee
332 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Sarbanes:

The plans by the Office of Management and Budget to remove questions from the 1988 Census dress rehearsal questionnaire have recently come to my attention. The removal of these questions questionnaire means that they will not appear in the 1990 census. I would like to go on record as opposing this plan.

The Census Bureau has put a great effort into designing the 1990 census questionnaire. They have been seeking public comment through meetings, advisory group discussions, consultations with other federal agencies, speeches before professional associations, etc., since the 1980 census was completed.

The data available through the census is not data business can get for itself. This is data that only the government, with its pledge of confidentiality and its universality of coverage, can gather. With no migration question there will be no way of knowing which kinds of places (cities, suburbs, newburbs) are growing or declining, and with which kinds of people. Today, migration accounts for most of our population shifts. How can government or business prepare for the future without such data?

By deleting the question on housing value, we will no longer have small-area information on the most important asset Americans own--their houses. Home equity accounts for 41 percent of Americans' net worth--our largest single asset.

The questions on labor force status and hours worked are crucial for measuring change by occupation and industry as well as by demographic traits and geographic location. With this information, we can design education programs, consumer products, and distribution and retail mechanisms that will increase well-being, not stunt it or even set it back.

A DOW JONES COMPANY

This is the information age. The census is the best--and for many activities our only--source of information. Without adequate knowledge of customers, companies can't compete effectively, and without knowledge of their constituents' needs, local goverments can't govern efficiently.

I urge you to insist that the 1988 dress rehearsal questionnaire be allowed to remain as proposed by the Census Bureau. I thank you for your consideration in this matter.

Sincerely,

Peter Francese
President

SPRPC

ALLEGHENY · ARMSTRONG · BEAVER · BUTLER · WASHINGTON · WESTMORELAND · CITY OF PITTSBURGH

August 10, 1987

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Frank R. Mascara
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Vice Chairman

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Metro Petrosky
Chairman
A. Dean Heasley
Co-Chairman

LOCAL GOVERNMENT PROJECTS

Carl E. Culp
Chairman

AIRPORT ADVISORY

Peter Flaherty
Chairman

STAFF

Robert Kochanowski
Executive Director

Norman Howenstein
Deputy Executive Director

Donald R. Arbuckle
Assistant Chief, OIRA
Office of Management and Budget
Washington, D.C. 20503

AUG 1 [illegible] REC'D

Dear Mr. Arbuckle:

The Southwestern Pennsylvania Regional Planning Commission recommends that the 1990 Census use the format initially proposed by the Census Bureau. The proposed deletions would seriously jeopardize the Commission's ability to respond to federal mandates for transportation planning and its requisite forecasts of future population, households, employment, and travel.

If the housing, population, transportation, labor force and "work-last-year" data items are deleted as now proposed, the Commission's forecasting capability will be crippled. We rely solely upon the Census for statistics about residence 5 years ago and the labor force; other critical data items concern transportation, number of automobiles per household, travel times to work, and fertility. This region could not afford to replicate these Census items with local surveys, nor would local surveys have the reliability and comparability of the Census.

Your concurrence with the Commission's recommendations is essential for proper and efficient implementation of the federal transportation objectives and planning programs.

Sincerely,

Frank R. Mascara
Frank Mascara, Chairman

Barbara Hafer
Barbara Hafer, Chairperson
Legislative Liaison Committee

Attachment

cc: Senator David Pryor
Representative Mervyn M. Dymally
William P. Butz, U.S. Bureau of the Census
Richard C. Hartman, National Association of Regional Councils

Southwestern Pennsylvania Regional Planning Commission · The Waterfront · 200 First Avenue · Pittsburgh, PA 15222-15
412 391-5590

Critical Data for Transportation, Economic, and Demographic Forecasting

1. Residence 5 Years Ago -- used to develop migration patterns. This data is an essential component of the population and employment forecasting procedure. No other sources of this data are available.

2. Fertility — used in cohort survival modeling for population forecast. The SPRPC model uses fertility rates by small geographic areas, which only the Census provides. Other available sources of data represent large geographic areas, usually a county.

3. Labor Force — detailed labor force data is essential for economic modeling and employment forecasting. No other sources of this data are available.

4. Work-Last-Year — essential component of the employment forecasting procedure.

5. Number of Automobiles — essential information for estimating trips per household and transit dependency. The SPRPC models use auto-ownership rates by small geographic areas, which only the Census provides.

6. Transportation — the "mode used for travel to work" is an essential input to the transportation model that predicts transit and auto trips. The transportation model also requires "travel time to work" data by small geographic area, which the Census provides.

7. Home Value, Rent, Source of Water, Public Sewer Service — SPRPC and local governments use these items for several planning purposes.

CONSORTIUM OF SOCIAL SCIENCE ASSOCIATIONS
1625 I STREET, N.W., SUITE 911, WASHINGTON, D.C. 20006 • [202] 887-6166

August 7, 1987

Honorable Paul Sarbanes
Chairman
Joint Economic Committee
SD-G01 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Sarbanes:

We applaud your calling hearings concerning the attempt by OMB to eliminate and downgrade questions concerning housing and other important issues from the 1990 census questionnaire.

The enclosed letter indicates our feelings about this unfortunate policy proposal from OMB. As an organization that has spent the past few years investigating OMB's attempts to diminish information collection, (we helped the House Science and Technology Committee to push for a GAO investigation of OMB's information collection clearance policies), we hope you will use all the power at your disposal to stop this proposal from going forward.

The Consortium of Social Science Associations (COSSA) represents 185,000 American scientists across the broad range of social and behavioral science disciplines. A list of COSSA Members, Affiliates, and Contributors is attached.

Thank you for your time and attention. If you have any questions please feel free to call us.

Sincerely,

Howard J. Silver
Associate Director for
Government Relations

ENCL.

American Anthropological Association • American Economic Association • American Historical Association • American Political Science Association
American Psychological Association • American Sociological Association • American Statistical Association
Association of American Geographers • Association of American Law Schools • Linguistic Society of America

CONSORTIUM OF SOCIAL SCIENCE ASSOCIATIONS
1625 I STREET, N.W., SUITE 911, WASHINGTON, D.C. 20006 • [202] 887-6166

August 6, 1987

The Honorable James C. Miller, III
Director
Office of Management and Budget
Washington, DC 20503

Dear Director Miller:

I am writing to express COSSA's concern about OMB's proposal to eliminate certain items from the 1988 Census Dress Rehearsal Questionnaire and to downgrade others to the sample component of that questionnaire. The collection of information, particularly in the methodical way of the decennial census, should be a major responsibility of the national government in a federal system. Good public policy planning and analysis depend on good data. The Paperwork Reduction Act should not utilized to justify the loss of information vital to those who must make public and private policy decisions affecting the future of this nation.

Data on housing and household trends which you propose to eliminate reveal future needs, not only for housing and construction, but for highways, schools, water and sewer lines, and other services and facilities important to state and local governments. Researchers in housing policy note that your proposed elimination and downgrading of housing items will make it difficult to collect crucial data necessary for local planning agencies to qualify for Federal programs. For example, the development of Housing Assistance Plans necessary for Community Development Block Grant applications require the kind of data you propose to eliminate. In addition, the need to measure physical quality and affordability and the need to estimate energy consumption and expenditures will also be lost. Many states and localities rely on the data from the housing census to develop housing needs profiles and to provide benchmarks in developing follow-up studies. State and local government collection of this data would not be cost-effective and information collection of this nature should be a federal responsibility. The housing items proposed for elimination should be restored to the questionnaire.

At a time when the Committee on National Statistics of the National Academy of Sciences has recommended the enhancement of fertility statistics, you are proposing to eliminate the question on the census that deals with this important issue. This seems short-sighted and unfortunate. In addition, when warnings of a 'birth dearth' are being debated, accurate information about fertility rates and patterns would help enlighten the debate as it moves from books and magazines to the public policy arena. The fertility item should be restored to the questionnaire.

American Anthropological Association • American Economic Association • American Historical Association • American Political Science Association
American Psychological Association • American Sociological Association • American Statistical Association
Association of American Geographers • Association of American Law Schools • Linguistic Society of America

The Consortium of Social Science Associations (COSSA) represents 185,000 American scientists across the wide spectrum of the social and behavioral sciences, many of whom rely on census data for their research and policy analysis. A list of COSSA's Members, Affiliates, and Contributors is attached.

Thank you for your time and attention.

Sincerely,

David Jenness

David Jenness
Executive Director

Howard J Silver

Howard J. Silver
Associate Director for
Government Relations

CC: Honorable Paul Sarbanes, U.S. Senate
Honorable Mervyn Dymally, U.S. House of Representatives
Honorable John Keane, U.S. Census

Consortium of Social Science Associations

Members

American Anthropological Association
American Economic Association
American Historical Association
American Political Science Association
American Psychological Association
American Sociological Association
American Statistical Association
Association of American Geographers
Association of American Law Schools
Linguistic Society of America

Affiliates

American Assembly of Collegiate Schools of Business
American Association for Public Opinion Research
American Educational Research Association
American Society of Criminology
Association for Asian Studies
Association for the Social Sciences in Health
Eastern Sociological Society
Gerontological Society of America
History of Science Society
International Studies Association
Law and Society Association
Midwest Sociological Society
National Council on Family Relations
National Council for the Social Studies
North Central Sociological Association
Northeastern Anthropological Association
Operations Research Society of America
Population Association of America
Regional Science Association
Rural Sociological Society
Social Science History Association
Society for the History of Technology
Society for Research on Adolesence
Society for Research in Child Development
Society for the Scientific Study of Religion
Southern Sociological Society
Southwestern Social Science Association
Speech Communication Association
The Institute of Management Sciences

Contributors

American Council of Learned Societies
University of California, Berkeley
University of California, Irvine
University of California, Los Angeles
University of California, San Diego
University of California, Santa Barbara
Carnegie-Mellon University
Center for Advanced Study in the Behavioral Sciences
University of Chicago
University of Colorado
Columbia University
Cornell Institute for Social and Economic Research
Cornell University
Florida State University
Harvard University
Howard University
University of Illinois
Indiana University
Institute for Research in Social Science, UNC-Chapel Hill
Institute for Social Research, University of Michigan
University of Iowa
The Johns Hopkins University
University of Maryland
Massachusetts Institute of Technology
Maxwell School of Citizenship and Public Affairs, Syracuse University
University of Michigan
University of Missouri
National Opinion Research Center
University of Nebraska
New York University
University of North Carolina, Chapel Hill
Ohio State University
University of Oregon
University of Pennsylvania
Pennsylvania State University
University of Pittsburgh
Princeton University
Rutgers University
Social Science Research Council
University of Southern California
Stanford University
State University of New York at Stony Brook
University of Tennessee, Knoxville
Texas A & M University
Tulane University
University of Virginia
University of Washington
University of Wisconsin, Madison
University of Wisconsin, Milwaukee
Yale University

OFFICE OF COUNTY EXECUTIVE

ELIZABETH BOBO
COUNTY EXECUTIVE

GEORGE HOWARD BUILDING
3430 COURT HOUSE DRIVE
ELLICOTT CITY, MARYLAND 21043
(301) 992-2011

August 7, 1987

Senator Paul Sarbanes
SD. 332 Dirksen Building
Washington, D.C. 20510

Dear Senator Sarbanes:

It has come to our attention that the Office of Management and Budget is proposing the deletion of an alarming number of data items from the questionnaire designed for use in the 1990 Census, and Howard County recommends firmly the retention of these questions in order to ensure the retrieval of invaluable data toward the making of informed decisions at the local level.

Therefore, please find attached a copy of my letter addressed to Donald R. Arbuckle of the Office of Management and Budget detailing our reasons for this recommendation, and I shall appreciate your careful consideration and active concurrence with these expressed needs of good government at the local level.

Sincerely,

William E Eakle

William E. Eakle
Acting County Executive

WEE/JGL/mjh

cc: Uri P. Avin
3718B

OFFICE OF COUNTY EXECUTIVE

ELIZABETH BOBO
COUNTY EXECUTIVE

GEORGE HOWARD BUILDING
3430 COURT HOUSE DRIVE
ELLICOTT CITY, MARYLAND 21043
(301) 992-2011

August 7, 1987

Donald R. Arbuckle, Ass't Chief, OIRA
Office of Management and Budget
New Executive Office Building, Room 3228
726 Jackson Place, N.W.
Washington, D.C. 20233

Dear Mr. Arbuckle:

Since writing a brief letter yesterday to your associate Ms. Wendy Gramm expressing the County's opposition to the deletion of important population, transportation-related and housing questions from the 1990 Census, it has come to our attention that a slightly more detailed rationale for our recommendation is in order.

Accordingly, the following programmatic applications of Census data would be seriously curtailed for this local government by the deletion of these essential questions for the 1990 Census: (1) residence five years ago is a basic factor in immigration and, therefore, population forecasting; (2) mode of transportation to work, carpooling, time of departure and travel time to work are not only key elements in transportation and traffic modeling, but the basis for such essential issues as commuting patterns, land use and highway planning; (3) all questions related to the residential labor force are critical to economic development and planning, and are vital to a County located centrally in the Washington-Baltimore corridor; and (4) each of the housing questions proposed for deletion have provided invaluable data for County planning and decision-making in the areas of housing and human service delivery systems. Perhaps the greatest loss, however, would be the ability to cross-tabulate these essential data items for the ongoing process of General Plan development, comprehensive zoning and budgetary forecasts. In addition, much of this information is required in the background narrative for Community Development Block Grant applications, as well as Section 3, Section 4(i) and Section 18 grant applications to the Urban Mass Transit Administration.

For these reasons, we shall be extremely interested in seeing the level of statistical information derived from the decennial Census remain (at the very least) at the fine standard achieved in 1980.

Sincerely

William E Eakle

William E. Eakle
Acting County Executive

WEE/JGL/mjh

cc: Senator Paul Sarbanes
Senator Barbara Mikulski
Senator David Pryor
Representative Benjamin L. Cardin
Representative Thomas McMillen
Representative Beverly Byron
Representative Mervin M. Dymally
William P. Butz
Uri P. Avin
File
3715B

OFFICE OF PLANNING AND ZONING

ELIZABETH BOBO
COUNTY EXECUTIVE

URI P. AVIN
DIRECTOR

GEORGE HOWARD BUILDING
3430 COURT HOUSE DRIVE
ELLICOTT CITY, MARYLAND 21043
(301) 992-2350
TTY (301) 992-2323

August 14, 1987

Donald R. Arbuckle, Ass't Chief, OIRA
Office of Management and Budget
New Executive Office Building, Room 3228
726 Jackson Place, N.W.
Washington, D.C. 20233

Dear Mr. Arbuckle:

You have already received from Acting County Executive William E. Eakle a rather definitive statement on Howard County, Maryland's opposition to the proposed deletion of crucial questions on population, transportation and housing from the 1990 Census questionnaire. However, speaking not only as the Director of the Office of Planning and Zoning, but also as Howard County's officially designated liaison to the U.S. Census Bureau, I want to address the same issue from these perspectives.

Accordingly, my primary concern is that the Office of Management and Budget's objective in the proposal is using the Paperwork Reduction Act of 1980 to effect savings in costs, and yet any analysis of the OMB proposal identifies the potential for disproportionate increases in cost and losses of revenue. Some examples are:

1. Economies of scale, alone, obviously support the inclusion of questions on vehicles per household, value of residential property or contract rent (for instance) in the single massive effort of a decennial Census, when compared with the cost of each individual county or city mounting a totally separate effort to obtain these essential statistics;

2. Without the full range of such Census data as housing costs, utilities, move-in dates and employment, the costs derived from potential error in budgetary and revenue forecasting could be debilitating to local governments;

3. The expectation of cost savings from reducing the paper required for each Census questionnaire is minuscule in the years 1988 or 1990; Howard County (along with other local governments and businesses) has responded to the Bureau's 1980 admonitions about future media releases by improving computer and microcomputer capability, so this is an era in which most data users will be receiving Census products in the form of computer tapes or floppy disks—thereby saving many tons of paper reports, microfiche blowbacks and computer printouts; and

4. As Senator Paul Sarbanes has already stated before the Joint Economic Committee on August 7, 1987--although reliable data are no guarantee that sound decisions will be made by business or government at any level, without them those sound decisions are virtually impossible. And the resulting costs are potentially enormous, in the final analysis, to the citizens of this country.

I certainly hope that in your leadership role with OMB's Office of Intergovernmental and Regulatory Affairs you will take a hard look at the balance sheet for the conduct of the upcoming decennial Census, and discern the existing evidence which clearly shows that savings in cost pertain overwhelmingly in the use of the questionnaire as designed by the Census Bureau for 1988 and 1990.

Sincerely,

Uri P. Avin, AICP
Director

UPA/JGL/mjh

cc: Elizabeth Bobo
George F. Harrison, Jr.
Senator Paul Sarbanes
Senator Barbara Mikulski
Representative Benjamin L. Cardin
Representative Thomas McMillen
Representative Beverly Byron
William P. Butz
3749B

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03631 MOORESTOWN NJ 08-07
0123P EST MOZE 12:30 EST

western union **Telegram**

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ICS IPMRNCZ CSP
4088246476 PRB TDRN CARMEL CA 97 08-07 1228P EST
ICS IPMMOZZ
SENATOR PAUL SARBANES, CHAIRMAN JOINT ECONOMIC COMMITTEE RPT DLY MGM
COPY MESSAGE, FONE 2022225424
SD/G01 DIRKSON SENATE OFFICE BLDG
WASHINGTON DC 20510

THANK YOU FOR YOUR ATTENTION TO THE PROBLEMS THAT WOULD BE CREATED BY THE ELIMINATION OF IMPORTENT HOUSING EMPLOYMENT AND TRANSPORTAION QUESTIONS FROM THE 1988 CENSUS DRESS REHEARSAL AND ULTIMATELY FROM THE 1990 CENSUS. YESTERDAY, THE U S CONFERENCE OF MAYORS NOTIFIED THE OFFICE OF MANAGEMENT AND BUDGET THAT IT OPPOSED THE PROPOSAL TO DROP THESE QUESTIONS. THIS IS A TIME WHEN ALL LEVELS OF GOVERNMENT MUST STRETCH SCARCE RESOURCES TO MEET GROWING NEEDS; IT IS NOT A TIME TO TAKE AWAY THE DATA WE NEED TO MANAGE THOSE SCARCE RESOURCES OR MEASURE THOSE GROWING NEEDS.

MEMBERS OF THE EXECUTIVE COMMITTEE AND ADVISORY BOARD, U.S. CONFERENCE OF MAYORS
ASSEMBLED AUGUST 7 1987
RICHARD L BERKLEY, MAYOR OF KANSAS CITY, PESIDENT
1620 I ST NW
WASHINGTON DC 20006

1228 EST

12:30 EST

IPMPOMX WSH

Con Edison
Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N.Y. 10003

August 6, 1987

Ms Dorothy Tella
Office of Management and Budget
New Executive Office Building
726 Jackson Place N.W.
Washington, D.C. 20503

Dear Ms. Tella:

We have been informed that under the guidelines of the Paper Reduction Act certain items of use to Con Edison will be dropped from the 1990 Census. We would request OMB to keep the following items in the questionnaire:

1. How living quarters are heated
2. What fuels are used for heating
3. What the costs of utilities and fuels are for living quarters

In addition to these specific utility-related items, we rely on unemployment data for long-term planning purposes and we strongly urge OMB to continue to collect these data.

Very truly yours,

Jeanne A. Grifo

Jeanne A. Grifo
Economist

cc: Wendy Graham, OMB
Donald Arbuckle, OMB

SECRETARY OF STATE ELECTIONS DIV
ROOM 1705 1 ASHBURTON PL
BOSTON MA 02108 06AM

Western Union Mailgram

4-0260358218 08/06/87 ICS IPMMTZZ CSP WHSB
6177272828 MGMB TDMT BOSTON MA 129 08-06 0256P EST

HONORABLE SENATOR PAUL S SARBANES
JOINT ECONOMIC COMMITTEE
DIRKSEN SENATE OFFICE BLDG G01
WASHINGTON DC 20510

DEAR SENAT SARBANES

AS THE OFFICER WHO MAINTAINS MASSACHUSETTS' RECORDS AND SUPERVISES OUR STATE CENSUS, I STRONGLY OBJECT TO THE OFFICE OF MANAGEMENT AND BUDGETS DECISION TO DELETE MANY IMPORTANT QUESTIONS FROM THE U.S. CENSUS BUREAU'S LONG FORM FOR THE 1990 CENSUS.

THESE QUESTIONS WILL PROVIDE SUBSTANTIAL AND IMPORTANT INFORMATION TO ME AND OTHER STATE OFFICIALS ABOUT SUBJECTS AS DIVERSED AS TRANSPORTATION AND HOUSING. FAILURE TO OBTAIN THIS INFORMATION WILL CRIPPLE THIS AND OTHER STATE GOVERNMENTS IN CARRYING OUT IMPORTANT DUTIES.

THANKS FOR HOLDING HEARINGS ON THIS CRITICAL ISSUE. I HOPE THAT THESE IMPORTANT QUESTIONS WILL BE RESTORED.

MICHAEL J CONNOLLY
MASSACHUSETTS SECRETARY OF STATE

CC: MARY JEKA SENATOR EDWARD M KENNEDY'S OFFICE

14:53 EST

MGMCOMP

President
DAVID W. HORNBECK
Maryland State Superintendent
of Schools

President-Elect
VERNE A. DUNCAN
Oregon Superintendent
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LYNN O. SIMONS
Wyoming State Superintendent
of Public Instruction

CHARLIE G. WILLIAMS
South Carolina Superintendent
of Education

Executive Director
GORDON M. AMBACH

August 6, 1987

The Honorable
Paul S. Sarbanes
332 Senate Dirksen Office Building
Washington, D.C. 20510

Dear Senator Sarbanes:

The Office of Management and Budget (OMB) has recommended deletion of 30 questions from the 1988 Census "Dress Rehersal". I wish to express my concern and suggest that caution be exercised in dropping any information that may erode the ongoing development of education indicators.

Many organizations, including the Council of Chief State School Officers (CCSSO) are currently engaged in the development and reporting of indicators of the health of education at the state level. With this effort has come a reliance on Census figures and anticipation of more current information from the next Decennial Census.

One indicator that is essential to state based planning and budgeting in education is a projection of school enrollments such as per pupil expenditure and graduation rates include predictions about enrollment that are premised, for planning purposes, on fertility and migration estimates.

We have been informed that the Joint Economic Committee will be weighing the implications of this proposal in hearing tomorrow.

Please consider the present movement in the area of education indicator development before dropping any questions from the 1988 "Dress Rehersal."

Sincerely,

Ramsay Selden/arc
Ramsay Selden, Director
State Education Assessment Center

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Su

City of Champaign

Office of the Mayor

102 North Neil Street
Champaign, Illinois 61820
Telephone (217) 351-4417

August 6, 1987

Donald Arbuckle
Office of Management and Budget
New Executive Office Building
726 Jackson Place, Northwest
Washington, D. C. 20503

Dear Mr. Arbuckle:

The City of Champaign strongly supports the proposed survey questionnaire developed with input from cities throughout the nation and tested by the Census Bureau. We, therefore, urge the United States Office of Management and Budget to support the questionnaire as proposed.

As a small municipality with a population of 65,000, we rely on detailed census block information on population and housing to develop housing, community and economic development, transportation and public works programs, and to make most efficient use of our own resources. For example, our police and fire departments also use census block information to monitor population shifts and to make appropriate manpower allocations. In addition, the proposed cuts will have a devastating effect on our ability to assess neighborhood conditions as required by federal and state programs.

We oppose the planned elimination of critical housing, population, economic, transportation, and energy data from the 1990 census and urge OMB to rescind the proposal.

Sincerely,

Dannel McCollum

Dannel McCollom
Mayor

DMcC/plg

City of Allentown
Pennsylvania 18101
(215) 437-7546

Joseph S. Daddona
Mayor

August 6, 1987

Mr. Donald Arbuckle
Office of Management and Budget
Old Executive Office Building
Washington, D.C. 20503

Dear Mr. Arbuckle:

We are writing in response to the request by the Office of Management and Budget to the U.S. Census Bureau to eliminate at least 30 questions from the 1988 Census Dress Rehearsal. Such a proposal, which if eventually carried into the 1990 Census, would remove vital base line data upon which the city can plan and program for its citizens.

Every day our Community Development and Finance Departments use data extracted from the decennial census reports or the supporting tapes. This data has been used extensively in the preparation of our comprehensive plan. Most importantly, without the census data there is no other reliable or methodical source upon which to turn.

It is our opinion that the proposed elimination of these questions will undermine our ability to understand the economic, demographic, and shelter needs of our community. We would encourage you to reconsider and not eliminate these questions from the Census.

Sincerely,

Joseph S. Daddona
Mayor

JSD:jf

xc: The Honorable H. John Heinz III, U.S. Senate
The Honorable Arlen Specter, U.S. Senate
The Honorable Donald L. Ritter, U.S. House of Representatives
William Butz, Associate Director for Demographic Fields, Bureau of the Census
National League of Cities
Donald M. Bernhard, Director, Community Development Department
Howard Kunik, Director, Administration and Finance Department
Michael C. Hefele, Director, Bureau of Planning
James P. Ritter, State-Federal Government Consultant

ALLENTOWN
ALL-AMERICA CITY
1962-'63 1975-'76

Metropolitan Council
300 Metro Square Building
Seventh and Robert Streets
St. Paul, Minnesota 55101

Telephone (612) 291 6359

August 5, 1987

The Honorable Rudy Boschwitz
United States Senator
506 Hart Bldg.
Washington, D.C. 20510

Dear Sen. Boschwitz:

This letter is in regard to a recent proposal of the Office of Management and Budget to cut nearly half the questions from the 1990 Census. Questions on migration, employment/unemployment status, travel behavior, rent and housing value are among those that would be dropped. The proposal would also change most of the other housing questions from being completely counted to being sampled. This is being done for the purpose of reducing the paperwork burden on the citizenry. We are not opposed to their objective, we just do not believe that a data source as crucial to so much analysis and public policy decision making, and one which occurs only once every 10 years, is an appropriate target.

We are also very concerned with the short time we have had to respond to this matter. We found out about this only a few days ago and are faced with an August 7 deadline for comment. What troubles us most is that most of the reasons for the proposed cuts were raised by the Office of Management and Budget several years ago. We had responded to this issue at that time and have been a part of the on-going planning process for the 1990 Census conducted by the Census Bureau. We had thought that these issues had been resolved. We do not know all of the intricacies of the approval process for the 1990 Census within the federal goverment. We do, however, want to restate our very strong support for the 1990 Census as it is currently planned.

We ask that you look into this matter and urge the Office of Management and Budget to accept the results of the Census Bureau's extensive planning and public participation process. The person in charge of this effort at the Office of Management and Budget is Dr. Wendy Gramm, Administrator, Office of Information and Regulatory Affairs. This issue is being discussed at a hearing convened by Sen. Paul Sarbanes on August 7. William Butz, Associate Director of the Census Bureau, is the person involved in this issue at the Census Bureau.

We could site numerous examples of how the Metropolitan Council uses census data. We have used virtually all of the data items the Office of Management and Budget proposes to cut. Migration is an area of particular current concern. With the depressed agricultural and mining economies in Minnesota, we need to know where people are moving and what their characteristics are so we can respond accordingly in plans for housing, education and retraining, economic development and the provision of human services. Transportation is another area of increasing concern for which the census provides irreplaceable data. The 1990 Census questions on transportation and employment that are proposed to be eliminated will be important in the on-going planning for transit and for addressing problems of increasing freeway congestion in the Twin Cities. Many more examples could be cited.

The Honorable Rudy Boschwitz
August 5, 1987
Page Two

An additional critical role of the census is to provide accurate benchmark data. Many of the alternate sources the Office of Management and Budget alludes to would not exist without accurate census data which are used as baseline data. The Metropolitan Council relies on such data in making annual estimates of households and population. This makes it especially important not to reduce the census sample size for key housing items such as housing type. A complete and accurate count of houses by type is needed to conduct future samples of the population. The labor force and employment data that is proposed to be eliminated is needed to benchmark widely used economic time-series data

If you need further documentation from the Council on its uses of census data, please contact Michael Munson, (612) 291-6331, of my staff.

Sincerely,

Steve Keefe

Steve Keefe
Chair

SK/dc

cc: Dr. Wendy Gramm

Lexington
Fayette
Urban
County
Government

SCOTTY BAESLER, Mayor

August 5, 1987

The Honorable Wendell H. Ford
United States Senate
173 Russell Senate Office Building
Washington, D.C. 20510

Dear Wendell:

We just learned of action by the U.S. Office of Management and Budget which could have a very detrimental impact on the functioning of this government. It relates to a directive issued last week by OMB to the U.S. Census Bureau to cut approximately 30 questions which are scheduled to be included in the 1988 Census Dress Rehearsal in preparation for the 1990 Census. The elimination of these data could seriously impair the planning functions of this government.

My Division of Planning informs me that the loss of certain housing and transportation data would seriously diminish our efforts to assess neighborhood conditions, analyze transportation facilities and target public transit. Specific information needed by the Division of Planning include: value of home, rent, residence five years ago, public sewer, number of bedrooms, number of autos, transportation/time to work, and labor force information.

We utilize these data for all our urban planning as well as for assessing and determining pockets of poverty for purposes of our enterprise zone and certain CDBG and UDAG projects, among myriad other projects. The OMB directive essentially eliminates necessary census data at the block level.

I am asking for your immediate attention to this as we are informed that Census officials must draw up their final versions to the 1990 Census survey by August 7, 1987 and submit the changes

Lexington-Fayette Government Center • 200 East Main Street • Lexington, Kentucky 40507 • (606) 258-3100

to OMB for final approval. I apologize for the immediacy of this situation but we only learned of this problem this week as well.

I would very much appreciate any help you can give us with OMB in restoring these very valuable data to the 1988 Census.

Sincerely,

Scotty

Scotty Baesler
Mayor

cc: Donald Arbuckle,
Office of Management & Budget

William Butz,
Bureau of the Census

Sv

City of Grand Junction, Colorado
81501-2668
250 North Fifth Street

August 5, 1987

Senator Tim Wirth
3489 W. 72nd Ave., Ste. 112
Westminster, CO 80030

RE: Office of Management and Budget (OMB) Reduction of Census Questions

Dear Senator:

In behalf of the City Council for the City of Grand Junction, Colorado, I am requesting the withdrawal of the U.S. Office of Management and Budget (OMB) directive, dated July 24, 1987, to delete nearly half of the proposed questions from the upcoming "dress rehearsal" census forms for the 1990 Census.

OMB's planned curtailment of data collection will have devastating effects on Grand Junction in establishing baseline data to determine the economic health of our community. Grand Junction and other cities throughout the country will be left with virtually no verified statistical data from 1980 to the year 2000 with which to plan critical business, housing, transportation, and social service programs. We will be losing an essential source of economic data which the U.S. Census Bureau has historically provided, and that Grand Junction cannot provide with its own resources. Further, the information being left in at the block level--the number of dwelling units at an address or in a structure--we do track and have good information on ourselves.

Without this critical information, the City of Grand Junction's efforts to target its scarce resources is made difficult, at best, or impossible.

I would greatly appreciate your investigation of, and assistance in, this matter.

Sincerely,

John Bennett

John Bennett
City Council President Pro tem

JB/tt

xc: National League of Cities
William Butz

Atlanta Regional Commission
100 Edgewood Avenue, NE, Suite 1801
Atlanta, Georgia 30335 • 404 656-7704

Harry West
Executive Director

ARC

AUG 1 [illegible] REC'D

August 5, 1987

Mr. Donald R. Arbuckle
Office of Management and Budget
NEOB
Washington, D. C. 20503

Subject: Proposed Content of Dress Rehearsal Census Questionnaire

Dear Mr. Arbuckle:

The Atlanta Regional Commission staff appreciates the opportunity to comment on the Office of Management and Budget recommendations regarding the content of the 1988 Dress Rehearsal Census. My comments regard the potential effect of some of these recommendations on the work of the Commission.

By way of background, the Atlanta Regional Commission (ARC) is the comprehensive regional planning and governmental coordinating agency serving the Atlanta Region. The Region includes the seven most urban counties in the Atlanta Metropolitan Statistical Area, 43 active municipalities, more than 2000 square miles and nearly 2.2 million residents. The Commission receives direct federal funding through a joint funding project from the Urban Mass Transit Administration, the Federal Aviation Administration, the Appalachian Regional Commission and the U. S. Environmental Protection Agency under the Clean Air Act. The Commission also receives Federal Highway Administration funds through the Georgia Department of Transportation; U. S. Environmental Protection Agency funds under the Clean Water Act through the Georgia Department of Natural Resources; U. S. Departments of Labor and Health and Human Services funds under the Older Americans Act through the Georgia Department of Human Resources; U. S. Department of Health and Human Services funds under Title XIX of the Social Security Act through the Georgia Department of Human Resources; and U. S. Department of Labor funds under the Job Training Partnership Act through the Georgia Department of Labor. ARC is also an Associate Member of the Georgia State Data Center.

Forecasts of future population and geographic distribution are primary inputs to many of ARC's planning programs. Census data are the foundation for these forecasts. For this reason many of our comments regarding specific census questions will relate to information needed to support the forecasting program for the Atlanta Region. We wish to strongly emphasize the need for these forecasts for policy planning and program enactment. We also wish to point out that ARC forecasts are used by local governments and the private sector as well as for regional planning.

Please note that the following comments address data needs that cannot be filled by any source other than the Decennial, United States Census.

Comments Regarding Deleted Questions

P14. Residence 5 years ago
This question provides the only reliable source of gross flow migration data crosstabulated by age, race and sex. Growth in areas like the Atlanta Region is largely the result of migration. Population forecasts require detailed data on the population characteristics of individual migrants. Data on net migration is not specific since it does not relate population characteristics. Since our need for this data is primarily at the county level, this question should be included on the sample questionnaire.

P23-P24. Transportation/time to work and H21. Number of automobiles
We uses the EMPIRIC geographic allocation model to forecast the geographic distribution of the Region's population. Transportation mode and travel time to work are key inputs defining the relation between place of residence and place of work in this model.

We also use a battery of transportation planning models to determine appropriate size and location of transportation facilities. Transportation mode, travel time and number of automobiles per household are important inputs to many of these models. We needs detailed tabulations of this information at the block-group level. These questions should be included on the sample questionnaire.

P25-P27. Labor force and P31. Work last year
These questions provide data that are useful in targeting JTPA efforts. These questions should be included on the sample questionnaire.

H6. Screener for value of home, H9. Value of own home, H10a. Rent, H13. Public sewer, H18a-d. Costs of utilities and fuels, H23. Real estate taxes, H25a-d. Mortgage, H26. Junior Mortgage, H27. Condominium fee and H28. Mobile home fee
These questions provide useful indicators of socioeconomic status of neighborhoods. They are used to target various local programs including housing revitalization and rent assistance. These questions should be included on the sample questionnaire.

H7. Telephone Number
The Census Bureau's addition of this item is intended to allow follow-up work to be done by telephone rather than by field-work. We believe that this technique would not only reduce the cost of the census but also would result in a significant improvement in data quality since it would allow quicker and more thorough resolution of problems. This question should be included on the sample questionnaire.

Comments Regarding Questions moved to Sample Questionnaire

H5. Condominium, H8. Owner/renter and H10b. Congregate housing
Many of our planning efforts require a thorough understanding of housing patterns in very small areas. Inclusion of these items in the sample rather than the 100% questionnaire would not allow the needed data to be tabulated for the very small areas that ARC's planning activities require. This is especially true for condominium units and congregate housing units. Because they are a relatively small share of total housing units, sample data will not provide reliable data for them for very small geographic areas.

I hope OMB will reconsider the Census questionnaire in light of some of the needs outlined in this letter.

I thank you for considering these comments.

Sincerely

Harry West
Executive Director

HW:BBL:pm

cc: Hon. Mervyn M. Dymally, Chairman, Subcommittee on Census and Population, U.S. House of Representatives, Washington, DC 20515

Mr. William P. Butz, Associate Director for Demographic Fields, Bureau of Census, Washington, DC 20233

bc: Mr. Fred C. Leone, Executive Director, American Statistical Association, 1429 Duke St., Alexandria VA 22314

✓ Mr. Richard C. Hartman, Executive Director, NARC, 1700 K Street, NW, Washington, DC 20006

Mr. George Marcou, Deputy Director, American Planning Association, 1776 Massachusetts Avenue, NW, Washington, DC 20036

Ms. Robin Kirkpatrick, State of Georgia, Office of Planning and Budget, 270 Washington Street, SW, Atlanta, GA 30334

DELAWARE VALLEY
REGIONAL PLANNING COMMISSION
The Bourse Building, 21 South 5th St., Philadelphia, PA 19106 (215) 592-1800

August 6, 1987

Mr. Donald R. Arbuckle
Assistant Chief, OIRA
Office of Management and Budgets
Washington, DC 20503

Proposed Dress Rehearsal Deletions
1990 Census

Dear Mr. Arbuckle:

The Delaware Valley Regional Planning Commission (DVRPC) is highly concerned about the current Office of Management and Budget (OMB) proposal to delete questions from the questionnaire to be used in the 1988 Census Dress Rehearsal. It is our assumption that questions not appearing in the Dress Rehearsal will not be considered for the 1990 Decennial Census.

The DVRPC is a Metropolitan Planning Agency, serving the nine-county Philadelphia/Trenton urbanized area with a population of more than 5.2 million. In addition to performing basic planning for this region, this agency provides for regional data needs as an affiliate to both the Pennsylvania and New Jersey State Data Centers.

Certainly, not all of the proposed deletions are of equal concern to our own programs and those of the many government agencies, businesses and persons that we serve. Some, however, are of critical importance to us and we would urge you to reconsider their deletion. This is especially so in the area of commuter transportation; population items 21b and 23-24; and housing item H21. The data contained in these questions is essential to DVRPC in planning and in development of the regional transportation system. We have used the 1980 transportation journey-to-work data (see attached Bulletin) and plan to use the 1990 information in the following areas:

- o Establishment of a data bank for transportation planning for use in most of our system and project planning studies.

Commonwealth of Pennsylvania • Bucks County • Chester County • Delaware County • Montgomery County • City of Philadelphia • City of Chester
State of New Jersey • Burlington County • Camden County • Gloucester County • Mercer County • City of Camden • City of Trenton

- Preparation of data summaries and evaluation of trends in development and commuting travel patterns throughout the region.
- Travel time information is essential to update DVRPC travel simulation models, especially the trip distribution model.
- Census travel time information will be used in highway and transit corridor studies since it is the only information available for transportation planning in the region.
- DVRPC traffic forecasting techniques have been developed based on travel time and commuting patterns collected in the 1980 census. The 1990 census information will be used to update these techniques.

This information is utilized to determine the location and size of highway and transit facilities and the priorities for highway and transit system improvements.

Data contained in other questions are required for studies which are essential to support economic development and mobility in the region. Population question 14 and housing question H22 are especially important. The data contained in these questions is a vital component of population projections prepared by this agency and are key indicators of neighborhood stability. The questions on water service (H12), public sewer (H13), and value of home (H9) are also important in defining neighborhood and infrastructure characteristics and contain data not readily available elsewhere.

As you must surely realize, the fiscal austerity at all levels of government reduces the opportunities for agencies such as ours to have the resources once available for the conduct of primary data collection. The Decennial Census has thus become virtually the sole source for much of our key planning data. Our experience in answering over 2500 census data requests yearly indicates that the above items are also key information elements for other government agencies, corporations, and individuals.

Office of Management and Budget
Mr. Donald R. Arbuckle
August 6, 1987
-3-

We strongly urge you to retain these itemized questions in formulating the 1990 census questionnaire. Please do not hesitate to contact me if you need any additional information concerning our position on this matter.

Sincerely,

John J Coscia

John J. Coscia mg
Executive Director

cc: Mr. William P. Butz, Bureau of the Census
Sen. David Pryor, Subcommittee on Federal Services
Rep. Mervyn M. Dymally, Subcommittee on Census & Population
Mr. James J. McDonnell, Federal Highway Administration
DVRPC Board Members

Bulletin No. 8 May 1986

1980 JOURNEY-TO-WORK PATTERNS IN THE DELAWARE VALLEY REGION

The Delaware Valley Regional Planning Commission (DVRPC) has been collecting, maintaining and updating transportation information for the nine-county Delaware Valley region since 1965. The 1980 Census provided a unique opportunity to update the 1970 Urban Transportation Planning Package (UTPP) as an essential tool for ongoing planning activities. It includes information on "Journey-to-Work" and socioeconomic data of the region's resident population and workers. DVRPC received the data tapes from the Census Bureau in early 1984. The contents of the UTPP data were obtained from responses to the long form questionnaire of the 1980 Census. Overall, one in six households was sampled and "place of work" characteristics were coded for one-half of this sample, resulting in a sample size of 8.33 percent of all households.

This bulletin (eighth in the series) contains several illustrations which display the different means of transportation for the resident workers in the Delaware Valley region. Table 1 shows the distribution of 1980 resident workers' means of transportation and Table 2 indicates the mean travel time to work by means of transportation in the nine counties. Figure 1 displays the distribution of resident workers within the Delaware Valley region and Figure 2 illustrates the percentage distribution of resident workers by means of transportation. Figure 3 shows the distribution of regional work trips by travel distance and Figure 4 presents the distribution of trips by travel time.

Table 2

1980 RESIDENT WORKERS
MEAN TRAVEL TIME TO WORK BY MEANS OF TRANSPORTATION

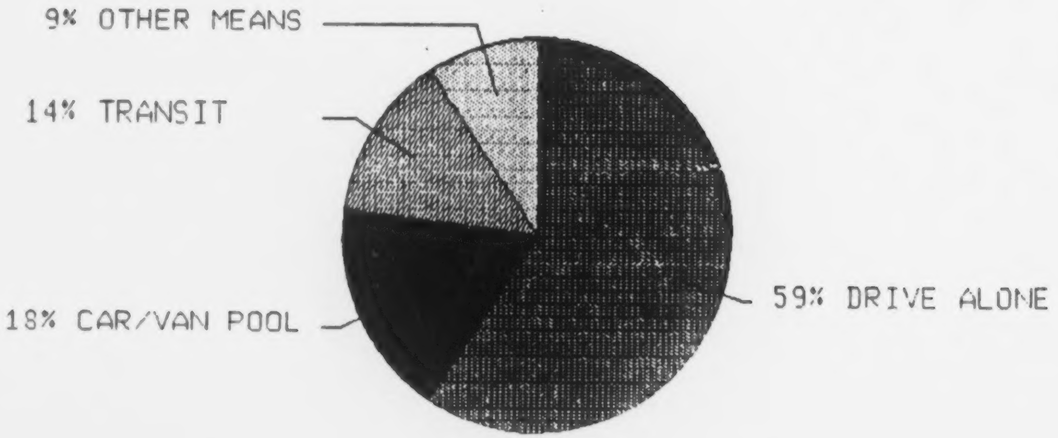
(Minutes)

County of Residence	Drive Alone	Vanpool	Carpool	Subway Elevated	Bus Streetcar	Railroad	Walk	Other
Bucks	22.2	32.4	25.2	54.2	49.8	66.3	7.3	24.0
Chester	21.4	28.6	23.7	44.9	39.7	54.2	8.0	22.3
Delaware	23.1	31.3	26.3	47.2	39.7	42.3	9.5	25.6
Montgomery	20.6	27.7	22.4	53.2	34.8	49.2	7.8	21.9
Philadelphia	25.5	35.0	29.4	42.7	41.5	45.4	11.9	29.8
Burlington	22.9	33.9	26.9	48.3	52.0	63.2	8.1	24.0
Camden	21.6	32.1	26.0	39.1	40.5	44.9	9.1	24.4
Gloucester	22.4	32.0	26.6	48.1	54.8	51.9	6.7	23.9
Mercer	19.5	26.9	22.0	60.6	35.5	82.5	9.1	21.7
REGION	22.5	31.6	26.0	43.0	41.4	50.5	10.0	25.3

- Railroad has the highest travel time, while walk has the lowest.
- The average travel time for public transportation is significantly higher than the average travel time for private automobile.
- The average commuting time in the suburbs is relatively small, but equal.
- The average travel time in Philadelphia County is the highest.

Figure 2

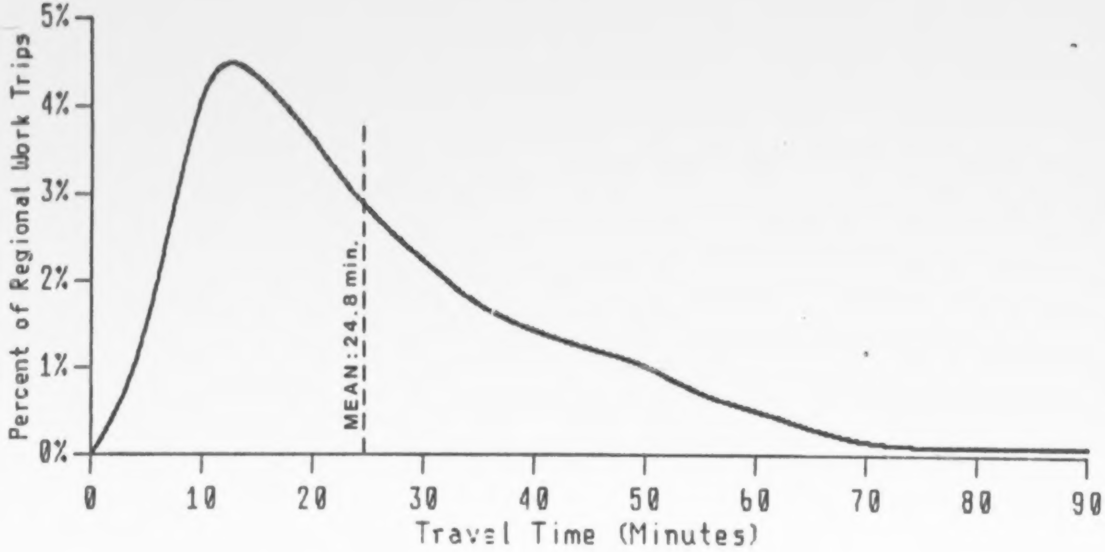
1980 RESIDENT WORKERS
MEANS OF TRANSPORTATION TO WORK



- Nearly 6 of 10 Delaware Valley resident workers (59%) drove alone to their place of work in 1980.
- Eighteen percent of the resident workers used carpools or vanpools to travel to work. Approximately one in eight resident workers (14%) used public transportation to reach their place of work.
- Nine percent of the resident workers used "other means" of transportation to reach their place of work.

Figure 4

DISTRIBUTION OF REGIONAL WORK TRIPS BY
TRAVEL TIME



Source: U.S. Bureau of the Census, 1980 UTPP.

Note: The distributribution of regional work trips does not include trips made by workers who were employed outside of the nine-county DVRPC region.

- More than 50 percent of work trips were made in less than 20 minutes.
- Approximately 2 percent of work trips took longer than 75 minutes.

DRCOG
Serving Local Governments Since 1955

Denver Regional
Council of
Governments

2480 W. 26th Avenue
Suite 200B
Denver, Colorado 80211
(303) 455-1000

August 6, 1987

[illegible] 1 2 REC'D

Mr. Donald R. Arbuckle
Assistant Chief, OIRA
Office of Management and Budget
NEOB
Washington, D.C. 20503

Dear Mr. Arbuckle:

Re: Proposed Changes in the Content of the 1990 Census of Population and Housing

The Denver Regional Council of Governments (DRCOG) is the regional planning organization for the Denver-Boulder CMSA. Forty-one of the area's counties and cities are DRCOG members. DRCOG is a major collector, user, and distributor of demographic and economic data and is an Affiliate Data Center in the State Data Center network. I serve as Census Statistical Areas Key Person for the 1990 census tract redefinition process. Census data plays a vital role in such functional planning areas as transportation, water quality, aging services, and regional development.

It is because of the nature of our regional planning work program, a broad interest in the quality and scope of census data, and a concern for the census planning process that we address the issue of questionnaire content. Our specific concerns are presented below.

Regional Planning Program

A number of our regional planning activities would be adversely affected by the proposed questionnaire changes. Transportation planning would be particularly hard hit by the elimination of questions on work commuting mode, carpooling, departure time, travel time and vehicle availability. Census data on these items represents a unique benchmark on which future needs for highways and mass transit facilities are based. Data collected by the census serves as reliable, small area inputs for transportation modeling. Such data will not exist if the questions are removed; replication of the census effort is beyond the capacity of this and other regional planning agencies. It is also essential that such information be collected nationally to comparatively assess progress on programs such as carpooling and mass transit. As the designated Metropolitan Planning Organization for transportation planning for the Denver-Boulder area, we have a particular interest in these questions and a continuing need for this data.

Board Officers
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Robert L. Tonsing, Vice Chairman
Elsie A. Lacy, Secretary-Treasurer
T.J. "Ted" Hackworth, Immediate Past Chairman
Robert D. Farley, Executive Director

Executive Committee
Marjorie E. Clement, Chairman
T.J. "Ted" Hackworth, Vice Chairman
Bob Brooks
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Federico Peña
Ronald K. Stewart
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Other items proposed for elimination are of significant value to our annual population and household estimates program. Questions on residence five years ago, fertility, and date moved into housing unit offer valuable insights into subregional growth patterns. Information on home value, rent, and labor force provide a basis for categorizing and analyzing small geographic units, documenting current conditions, and projecting future need. Eliminating questions on labor force and unemployment would eliminate reliable inputs that are used in forecasts of population and employment. Small area labor force data illuminate differences in women's roles, age structure, and economic activity levels.

The wholesale deletion of many housing questions would severely impact our ability to assess the characteristics of the housing stock. It would eliminate many of the tools we use to monitor housing change for small geographic units. The measurement of neighborhood decline or impacts of revitalization efforts would therefore be critically impaired.

Quality Data

DRCOG has a strong interest in maintaining the quality, scope, and comparability of census data. The OMB recommendations represent a significant departure from these goals. Much of the data presently collected by the census which is proposed for elimination by OMB is not available elsewhere, particularly for small geographic areas. Deletion of items would represent irretrievable breaks in existing time series. In addition, the proposal to shift items from 100 percent collection to the sample questionnaire would diminish reliability for the items shifted and would delay their tabulation and release. The decennial census has evolved beyond a mere head count in response to the needs of an increasingly complex society. Census users, public officials, and the American public expect the census to provide a picture of the characteristics of the nation. The OMB proposal would seriously diminish this vital aspect of the census.

Census Planning Process

It is particularly objectionable that at this late date, OMB should attempt to substitute its views on proper questionnaire content in place of those of census users collected in hundreds of public meetings. In 1984, DRCOG staff attended initial meetings discussing 1990 census questionnaire content. Over the past three years we have participated in subsequent meetings along with many other Coloradans from the public and private sectors. The process used by the Census Bureau to determine questionnaire content was open and methodical. The results of this public process should be utilized rather than rejected.

Mr. Donald R. Arbuckle
August 6, 1987
Page 3

We strongly urge you to withdraw your proposed deletions and shifts of 1990 census questions. We recommend that the questionnaire be approved as submitted by the Census Bureau. Given the inherent cost of the census, special care must be taken in developing a questionnaire that insures the collection of quality data for use in regional planning activities. Your cooperation in getting 1990 census planning back on track is essential.

Sincerely,

Robert D. Farley
Executive Director

RDF:dc

cc: William P. Butz, Associate Director of Demographic Fields
Senator David Pryor, Chairman, Subcommittee on Federal Services, Post Office, and Civil Service
Representative Mervyn M. Dymally, Chairman, Subcommittee on Census and Population
Colorado Congressional Delegation
William F. Adams, Regional Director, United States Department of Commerce, Bureau of the Census

semcog

August 10, 1987

AUG 10 REC'D

Donald R. Arbuckle
Office of Management and Budget
New Executive Office Building
Washington, D.C. 20503

Dear Mr. Arbuckle:

This letter concerns the 1990 census, and the questions proposed to be included in this national data collection effort. It has come to our attention that the Office of Management and Budget has informed the Census Bureau that about 30 questions should be eliminated from the questionnaire that is to be used in the 1988 Census Dress Rehearsal. It is our understanding that questions eliminated from the dress rehearsal would most likely also be eliminated from the 1990 census questionnaire. We are writing to express our deep concern regarding this proposal. We believe that such a cutback in the 1990 census would result in a major, irretrievable loss of key information about the more than 4.5 million persons who reside in the seven-county southeast Michigan region.

SEMCOG, the Southeast Michigan Council of Governments, is a voluntary association of governmental units. SEMCOG's principal activity is planning, including adoption of regionwide plans and policies in the areas of transportation, community and economic development, water and air quality, solid waste disposal, sewage treatment, storm drainage, and other environmental concerns, as well as public safety and land use. Additionally, SEMCOG is the Federally-designated Metropolitan Planning Organization (MPO) for the seven-county southeast Michigan region.

SEMCOG also maintains the region's most extensive data base for planning and for economic development work. A large portion of this information consists of data either taken directly from the decennial census, or else generated using census data as a major input. If we were to describe all of our varied uses of decennial census data, the resulting letter would be extremely long. Therefore, we will confine our statement to a few examples that we hope will illustrate the unparalleled importance of the entire decennial census.

NANCY L. DAVIS
Chairperson
Supervisor,
Ann Arbor Township

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Councilman,
City of Detroit

MARTHA L. HOYER
Vice Chairperson
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JOHN M. AMBERGER
Executive Director

DEMOGRAPHIC AND HOUSING APPLICATIONS OF THE CENSUS

Forecasting Household and Population Change by Small Area

One of SEMCOG's major uses of decennial census information is in forecasting household and population characteristics. Census data provided a basis for the creation of our mathematical forecasting system. Census data also provided much of the forecast's base year data. The product of this forecasting system is the Small Area Forecast (SAF), which consists of forecasted household, population, and employment data, for a 20-year planning period. The term "small area" reflects that fact that these forecasts are done for approximately 1,400 separate small geographic areas, many of which correspond to census tracts.

For example, we have used decennial census data to quantify how households compare to the housing they occupy. Specifically, we have examined the life cycle and income characteristics of households that changed place of residence between 1975 and 1980, and compared those characteristics to the form of tenure (owner or renter) and the value of the housing (selling cost or rent) those mover households occupied as of 1980. These quantified relationships were used to forecast future household relocations. It is because the decennial census integrates demographic data and housing data, making possible cross-tabulations of the two sets of information, that such quantification is possible. In fact, the 1980 decennial census made it possible to do such cross-tabulations for sub-county geographic areas which had a minimum population of 100,000. If Question 14, Residence 5 years ago, Question H9, Value of own home, Question H102, Rent, and Question H22. Date moved in, were to be removed from the 1990 census, it would not be possible to quantify the demographic/housing relationships just described, as they would exist in 1990. Instead, we would have to attempt to use the 1980 data. However, given the rate at which urban areas can change, we are certain that a forecast based on such out-of-date information would be seriously lacking in dependability.

Sanitary Sewers, and On-Site Sewage Disposal

On a quite different subject, we note that Questions H13. Public sewer, is proposed to be eliminated. SEMCOG has used data derived from that question in earlier censuses. Counts of housing units having public sewer service, tabulated by block group and census tract, were used to indicate the spatial extent of areas having installed public sewer service. Without such data, we would have had to visit every sewer system operator to collect the data first hand.

Counts of housing units served by on-site disposal systems have been used to estimate the amounts of septage generated in each community. Septage is the solid material that collects in septic tanks; it must be removed periodically. The disposal of septage is a growing problem, both in this region and nationally.

TRANSPORTATION APPLICATIONS OF THE CENSUS

As is true with some of the previously described census applications, the journey-to-work items in the census have provided SEMCOG and other agencies and governments involved in transportation planning with detailed cross-tabulations of transportation data available nowhere else. The only other large sample data source available to SEMCOG containing small area tract data on auto availability, place of work, travel time and mode to work has been the Detroit Regional Transportation and Land Use Study (TALUS) dataset. This dataset, while rich in detail and based on over 41,000 surveyed households, dates back to 1965, and is totally outdated and inadequate for planning in 1987. Planning agencies have been actively discouraged by their Federal and State funding agencies from repeating such costly, large-scale, custom surveys. They have instead been encouraged to use the census tabulations, which have the advantage of being standardized throughout the country. Without 1990 decennial census data on the above items, transportation planning around the nation would once again be dependent upon costly large scale surveys.

Use of Census Data for Transportation Plans and Corridor Studies

The journey-to-work items have been incorporated in a number of key transportation planning applications. The most important application has been to facilitate the calibration of mathematical models to forecast travel among tracts or traffic zones in Southeast Michigan. These travel forecasting models are used to simulate, by computer, the impact of building new roads or transit lines or widening existing facilities, or simply to identify locations with predicted future traffic congestion. The forecasts provided by these models for corridor or regional studies are required by the Federal Highway Administration to provide a sound technical basis for allocating road improvement funds throughout our region. In FY1987, this assistance amounted to more than $300 million.

The number of automobiles item assists in developing the procedure to predict future daily travel in a corridor. The time-to-work tables have been invaluable in verifying that these forecasting models accurately replicate prevailing traffic patterns between major origin-destination pairs or in key corridors. The mode-to-work data are used to verify that the proper percentage of trips is allocated to buses, to carpools, and to persons driving alone to work. These percentages are crucial in ensuring that roads are economically designed to accommodate just the number of cars and buses necessary to carry all travelers. For example, an incorrectly low carpool occupancy might lead to a road being overdesigned with more lanes than necessary. With freeway construction costs falling into millions of dollars per mile, this is a costly kind of mistake.

It is extremely important that the above data be available at the current traffic zone or census tract level. There are, for example, large differences in auto availability throughout the region. While the region as a whole has 14% of households without a car, this soars to over 25% within the City of Detroit and falls to under 5% in more distant suburban areas. These wide variations greatly influence which area will have more or less auto traffic, or have greater or fewer potential transit riders. Moreover, the planning of new roads or transit lines requires detailed origin-destination data by mode highlighting travel corridors with persons living or working in proximity to the proposed facility. These facilities are built on a corridor-by-corridor basis, a situation where county-to-county or more highly aggregated data are unacceptable.

Other Applications of Census Journey-to-Work

Census journey-to-work data cross-tabulations have been used to identify specific site and corridor travel patterns in a number of specialized studies. For example, in 1986 SEMCOG provided the Urban Mass Transportation Administration with downtown-oriented worker trip tables cross-tabulated by mode to assist in generating ridership forecasts for Detroit's $200 million automated rail system, which has just opened. The data were used to facilitate preparation of an annual financial plan.

ADDITIONAL APPLICATIONS

Although we will not take the space necessary to detail any of the other census data applications we have made, we feel that we must emphasize that the other data items threatened with elimination are also very important. Labor force characteristics, including unemployment and hours worked, are key measures of the degree to which residents participate in the economy. Data on fertility give us clues to future birth rates. The package of items that relate to the variety of expenses involved with housing provides good, usable data on the total cost of shelter. This full set of shelter-related costs was a major improvement to the 1980 census.

To summarize, SEMCOG believes that the 1990 questionnaire developed by the Census Bureau is the product of a commendable process of content development. Decennial census data are a national resource, well worth the money, time, and effort that their collection, processing, and dissemination require. SEMCOG needs a full census in 1990, as has been proposed by the Census Bureau, so that we can continue to meet our planning responsibilities to our region.

Sincerely,

John M. Amberger

John M. Amberger
Executive Director

JMA/vw

cc: William P. Butz, Associate Director, Demographic Programs,
Bureau of the Census

Southeast Michigan Congressional Delegation

CENTRAL VIRGINIA PLANNING DISTRICT COMMISSION
P.O. Box 2526 - 2316 Atherholt Road - Lynchburg, Virginia 24501 - Tel. No. (804) 845-3491

AUG 20 REC'D

August 13, 1987

Wendy Gramm
Office of Information and Regulatory Affairs
U.S. Office of Management and Budget
1726 Jackson Place
Washington, D.C. 20503

Dear Dr. Gramm,

The Central Virginia Planning District Commission staff has reviewed the proposed cuts in the census questions for the 1988 Dress Rehearsal. We would like to express our opposition to the cutting of several of the questions. As a planning organization we have found this data very useful to our work in analyzing demographics, developing comprehensive plans and preparing housing and transportation improvement programs. Specifically, we are opposed to the deletions of the following questions:

Residence five years ago - This question is valuable in determining the mobility and stability of the local populations. Data from this question can identify migration patterns for the overall population and subgroups and provide information useful to population projections.

Transportation/time to work - Data from this question is important to urban transportation studies. The identification of trip lengths, mode of transportation to work and persons in car-pools is valuable to the modeling of traffic patterns and traffic system improvements.

Sources of Water and Public Sewer - These questions are extremely valuable to rural areas with limited public water and sewer service or with developing public services. Data from these questions serves to graphically illustrate trends in, for example, well water use or septic tank use. In this era of heightened concern over environmental degradation, this data provides basic valuable information relevant to ground water protection. It also provides supporting documentation for the need or lack of need for public water and sewer service.

Value of own home and rent - Data from these questions provides a good yardstick for measuring housing demand and housing value between communities and within communities. Housing values and rents supplement income data in determining the distribution of wealth in a community. The data also provides fundamental information for determining housing needs.

Number of Housing Units at Address - The number of housing units at an address is important in identifying land use trends, housing trends and population concentration. Data of this nature is also used for transportation modelling and land use and zoning plans.

Amherst County—Appomattox County—Bedford County—Campbell County
City of Bedford—City of Lynchburg—Town of Amherst—Town of Appomattox

Number of Automobiles per household - This data is integral to the development of transportation models. The number of vehicles available to a household is a prime determinant for estimating trips by the members of the household.

Fuels for heating home - Information from this question has important public policy implications. With the growing world shortage of combustible fuels, it would be wise to continue monitoring the trends in local and national fuel consumption. For example, the 1980 census recorded a major shift to wood as a source of fuel. The monitoring of these trends is vital to public policy concerns especially should there be another fuel shortage.

It is hoped that this letter will encourage the OMB and the Census Bureau to reconsider the need for these data questions. As a planning staff of individuals who have worked with local governments in Arkansas, Georgia, Indiana, Maryland, West Virginia and Virginia, we have repeatedly used information from the above referenced data items. It would be tragic to eliminate this useful data from the 1990 census loosing both the 1990 data and the trend comparisons to the 1970 and 1980 census information.

Sincerely,

Will W Hibbert III

William W. Hibbert, III
Executive Director

WWH/dr

cc: The Honorable John W. Warner, United States Senate
The Honorable Paul S. Trible, Jr., United States Senate
The Honorable David Pryor, United States Senate
The Honorable W. C. Daniel, United States House of Representatives
The Honorable James R. Olin, United States House of Representatives
The Honorable Mervyn M. Dymally, United States House of Representatives
Mr. William P. Butz, U.S. Bureau of the Census
Mr. Larry Robinson, Virginia Department of Planning and Budget
Mr. Richard Hartman, National Association of Regional Councils

PUEBLO
City of Pueblo

Lincoln

Frank Shafroth — FYI

August 5, 1987

Mr. Donald R. Arbuckle
Office of Management and Budget
NEOB
17th Street between PA Ave. & H St., NW
Washington, DC 20503

Dear Mr. Arbuckle:

With astonishment and dismay, I learned of the proposal by OMB to delete approximately 30 questions from the 1990 Census forms. If this proposal is implemented, cities will be forced to make many planning decisions, particularly with regard to housing, transportation, and employment, without any basis for statistically justifying them. Planning policies will be based upon arbitrary whim, rather than an efficient allocation of resources to best serve the public need.

The Census Bureau has, over the past few years, contacted a broad spectrum of data users to determine 1990 Census form content. Numerous meetings have been held with the intent of allowing public input into the decision-making process. The OMB proposal, if implemented, will adversely effect the private, as well as public sector. Many marketing consultants rely on Census data as a basis for intelligent business decisions.

I am particularly concerned to see that the following items be retained in the 1990 Census, although any reduction in the content will impair the usefulness of the Census.

Residence five years ago: This question is used in assessing migration trends. Data obtained from the question is often used in evaluating the migration component in population estimates and projections.

Hours worked last week: Used to determine full and part-time employment, it is particularly valuable to have data from this question for areas experiencing economic hardship, in order to assess the extent that part-time employment contributes to total employment.

Transportation/time to work: Data derived from this question is used to assess commuting patterns and traffic flow. Its elimination would impede greatly the transportation planning efforts of local governments.

P.O. Box 1427 Pueblo, Colorado 81002 (303) 545-0561

Labor force: Of the population questions proposed for elimination, deletion of this one makes the least sense. Data on employment, unemployment, and the labor force are used as a bench-mark in developing and adjusting unemployment estimates prepared by state and local governments. Elimination of this question would severely restrict local governments' ability to assess the economic well-being of their communities.

Value and rent: Information derived from these questions is used in local HUD mandated programs. Without data which would be obtained from these questions, local governments would be virtually unable to assess changing housing conditions in their jurisdictions. Statistics on housing value and rent are also used by the private sector, particularly real estate appraisers and developers.

Number of bedrooms: This question is also used by local housing programs as a means of assessing housing condition and overcrowding.

Date moved in: I have used data derived from this question from the 1980 Census to determine occupancy rates, as a step in developing local population estimates.

Fire, hazard, and flood insurance: Although I personally might not have occasion to use data from this question, I believe that it might be very useful in disaster assistance planning, especially flood hazard mitigation.

I hope that OMB will take a more reasonable approach in evaluating the elimination of 1990 Census questions. Over the past several years, the Census Bureau has carefully evaluated the questions to be included on the 1990 Census form. These efforts should not be disregarded without a reasoned consideration.

Sincerely,

Don R. Vest

Don R. Vest
Statistical Data Librarian

cc Mr. William Butz, U. S. Bureau of the Census
Mr. Frank Shafroth, National League of Cities
Mr. Jim Munch, City of Pueblo Planning Dept.
Mr. Chuck Finley, Pueblo County Planning Dept.

Lexington
Fayette
Urban
County
Government

SCOTTY BAESLER, Mayor

August 5, 1987

Mr. Donald Arbuckle
Office of Management and Budget
New Executive Office Building
726 Jackson Place N.W.
Washington, D.C. 20503

Dear Mr. Arbuckle:

I am forwarding you a copy of a of letter sent to Senators Wendell Ford, Mitch McConnell, and Congressman Larry J. Hopkins regarding a recent directive from OMB to the Bureau of the Census regarding the 1988 Census Dress Rehearsal. In the enclosed letters you will note our reasons for strongly objecting to OMB's directive to delete certain census information at the block level. This would be extremely detrimental to our urban planning process, our transportation planning, and our CDBG and UDAG project planning.

I hope you will take time to read my comments and carefully consider our request to rescind the recent directive to the Bureau of the Census.

Sincerly,

Scotty Baesler

Scotty Baesler
Mayor

Encl.

Lexington-Fayette Government Center • 200 East Main Street • Lexington, Kentucky 40507 • (606) 258-3100

Miami Valley Regional
Planning Commission

117 South Main Street
Suite 200
Dayton, Ohio 45402
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Chairman
Donna B. Moon

Executive Director
Nora E. Lake

AUG REC'D

August 4, 1987

Mr. Donald R. Arbuckle
Assistant Chief, OIRA
Office of Management and Budget
Washington, D.C. 20503

Dear Mr. Arbuckle:

We have become aware that OMB is asking the Census Bureau to shorten the 1990 census forms by eliminating or reducing data collected. We are concerned about the effects of such an action on the adequacy of data available to address important regional issues and decisions in our five county area. We also believe that our planning capabilities will be seriously weakened in the following areas:

1. The Miami Valley Regional Planning Commission (MVRPC) would be adversely affected by the loss of any data from the transportation-related items, such as method of transportation used to get to work or the number of automobiles available to a household. MVRPC is involved in the allocation of federal highway funds, usually numbering in the tens of millions of dollars per year. Allocation of this money is based in large part on traffic flow models to which census data is a major input. Loss of this data, for which there is no equivalent local substitute, could lead to millions of dollars per year in wasted transportation expenditures.

2. MVRPC would also be adversely affected by the proposed deletion of several detailed labor force and hours worked items from the census. We are heavily involved in human services delivery planning, including attempts to eliminate welfare dependency by enhancing the employability of welfare recipients. The Census is the best source of detailed labor force data at the local level, so loss of this data would make it difficult to investigate the effects of labor force participation on the incidence of various social problems.

3. MVRPC is opposed to the deletion of census data items which deal with the physical characteristics of the housing stock, such as source of water supply and sewage disposal, heating fuel and equipment, or the number of bedrooms. This type of data is used in a wide variety of programs, including water quality planning and long-range land use planning. Some of this data is available from alternate sources, such as public utilities, but in a multi-county area like MVRPC's, obtaining it requires a substantial commitment of time and effort, which is often paid for with federal dollars. In all likelihood, any money saved by eliminating these data items from the Census would be more than offset by the extra costs of various research and planning programs financed by EPA, HUD and other agencies.

NJ TRANSIT

August 3, 1987

Ms. Dorothy Tella
Office of Management and Budget
New Executive Building
726 Jackson Place, N.W.
Washington, D.C. 20503

Dear Ms. Tella:

I just learned of the recommendations by the Office of Management and Budget to sharply curtail the information requested for the 1990 U.S. Census. The proposals are devastating. In the public transportation arena, census information regarding journey to work, mode of travel, work location and related transportation information is vital in guiding public transportation investments in the nation's urban/suburban areas. Without this information, decisions will undoubtedly be made with inadequate information leading to potentially poor investment decisions.

I would hope that you seriously reconsider your proposals. I am sure you recognize, given your own need for quality information, that good policy and plans cannot be achieved without good information.

Thank you for giving serious consideration to this matter.

Sincerely yours,

Jeffrey M. Zupan, Director
Department of Planning

JMZ:awe

cc: Gene Lessieu

McCarter Highway & Market St., P.O. Box 10009, Newark, N.J. 07101 (201) 648-7300

Frank

Sc

NC LM

NORTH CAROLINA LEAGUE OF MUNICIPALITIES
Local Government Center/W. Lane and N. Dawson Streets
P. O. Box 3069/Raleigh, North Carolina 27602 (919) 834-1311

July 31, 1987

Mr. Donald Arbuckle
Office of Management and Budget
726 Jackson Place, NW
Washington, DC 20503

Dear Mr. Arbuckle:

On behalf of the 489 cities in North Carolina please reconsider your decision to cut important questions from the 1988 Census Dress Rehearsal and restore them to the proposed format for 1990. Our understanding of the proposed cuts suggest that they will have a devastating effect on the ability of local officials in North Carolina to determine and plan for their economic health.

It is imperative that local planners and officials have key housing characteristics information available to make decisions that will determine the character and growth of their towns for decades to come. The U.S. Census is the most important and systematic source for this information and we urge you to restore housing and population data questions to the proposed format for 1990.

We would appreciate any information you can provide and request that you add us to the list of people you keep informed on changes concerning this question.

Sincerely yours,

Terry A. Henderson

Terry A. Henderson, Director
Intergovernmental Programs

bcc: ✓ Mr. William Butz, Associate Director for Demographic Fields - Census Bureau
✓ Mr. Reggie Todd, National League of Cities

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Mayor Winston-Salem

Executive Director
David E. Reynolds
NCLM Raleigh

U.S. DEPARTMENT OF TRANSPORTATION

CRITICAL REQUIREMENTS FOR DATA FROM THE 1990 CENSUS

Prepared at the request of the
Office of Management and Budget
for use by the Federal Agency Council
on the 1990 census.

June 24, 1985

U.S. DEPARTMENT OF TRANSPORTATION
CRITICAL REQUIREMENTS FOR DATA FROM THE 1990 CENSUS

INTRODUCTION

This document summarizes requirements for data from the 1990 census that are critical for the administration of DOT programs. Transportation questions have been an integral part of the decennial census since 1960 when three such items appeared for the first time. By 1980, with the sharp increase in the need for statistics for transportation planning and policy formulation brought about by concern over the nation's supply of nonrenewable energy sources and the problems of traffic congestion snarling our metropolitan areas, the number of transportation items included in the census had increased to eight. The transportation questions in the 1980 census were: place of work (Q23), means of transportation to work (Q24b), carpooling arrangements (Q24c), number of persons in the carpool (Q24d), travel time to work (Q24a), public transportation disability status (Q19), number of automobiles available to each household (QH28), and number of trucks and vans available to each household (QH29). A facsimile of these questions is provided in the appendix to this document.

All of DOT's critical requirements for small-area data from the 1990 census--data collected in the large sample that will give characteristics for such areas as block groups and census tracts--can be met by modifying the questions that were included in 1980. No additional questions are required. The transportation questions in the 1980 census were the product of experience gained in the 1960 and 1970 censuses and the Journey to Work Supplement to the Annual Housing Survey, conducted for DOT by the Bureau of the Census from 1975 to 1977. They provide the basic, benchmark information required for transportation planning in the United States. Also, it is imperative that comparability between census be maintained in order to identify historical trends.

Critical requirements for large-area data needed for national transportation policy formulation (data collected by a small sample that would give characteristics for states) can be met if the 1990 census includes an additional sample to obtain important information that is not needed in fine geographic detail.

DOT's requirements for data from the 1990 census are summarized below. It is expected that the Bureau of the Census will test each of these recommendations as part of its test census program.

SMALL-AREA DATA REQUIREMENTS

Place of Work

The 1980 place-of-work question (Q23) should be retained for the 1990 census. Place-of-work addresses should be coded to the block level within metropolitan areas and to the place and county level elsewhere. As in 1980, the place-of-work question included in the 1990 census should refer to the location where the respondent worked most of the time "last week" (the week prior to enumeration, usually termed the "reference week").

Data that describe the distribution of the labor force by place of work are the cornerstone of the transportation statistics collected in the census. Other journey-to-work questions (means of transportation to work, carpooling to work, and travel time to work) provide important characteristics of the work trip. Place-of-work information is used in combination with the place-of-residence location to portray commuting patterns. Commuting data at the block level are aggregated into traffic analysis zones in the creation of data bases that are used in transportation planning. Therefore, DOT encourages the Bureau of the Census to continue in 1990 the significant improvement in the accuracy of place-of-work coding that was achieved in 1980.

A question on place of work has been included in each decennial census since 1960, and the information has been coded to block since 1970.

Means of Transportation to Work

Several important modifications to the 1980 census means of transportation to work question (Q24b) are required for 1990 to improve the accuracy of the resulting data while at the same time reducing possible respondent confusion. The first modification is to combine the individual 1980 response categories "Car," "Truck," and "Van" into one response: "Car, truck, or van." This information, combined with information on the number of persons riding in the vehicle (see discussion of carpooling to work), will provide the necessary data on the use and efficiency of the dominant modes of personal transportation in the 1990's.

The second modification involves the clarification of certain public transit modes. The 1980 response category "Bus or streetcar" confused users of trolley and lightrail transit in our large metropolitan areas and prevented an accurate count of bus riders, the predominant public mode. Therefore, "Bus or streetcar" should be separated into two responses for 1990: "Bus or trolley bus" and "Streetcar or trolley car." In addition, a response for "Ferry boat" should be added to obtain much needed data for our large coastal metropolitan areas such as New York, Boston, New Orleans, San Francisco, and Seattle. With the combining of "Car," "Truck," and "Van" into one response category, the separation of "Bus or streetcar" into two categories, and the addition of "Ferry boat," the number of transportation methods listed in the 1990 question would be the same as in 1980.

The third modification pertaining to the means of transportation question is to obtain information in 1990 on all modes of transportation used in the trip to work as well as the principal mode (the one used for the greatest distance during the trip). Only the principal mode was requested in 1980. Multimodal commuting in our metropolitan areas, often involving more than one type of public transportation in addition to the automobile, is one of the key components of transportation data heretofore missing from the census. Limiting the question to the principal means of transportation underestimates public transit use.

The means of transportation question included in the 1990 census should refer to the method(s) of transportation that the respondent usually used to get to work "last week," and produce small-area data in combination with the place-of-work question. The method of transportation used by commuters to get from home to work is one of the fundamental characteristics of the work trip. Like the place-of-work item, a question on means of transportation to work has been included in each census since 1960.

Carpooling to Work

Carpooling information for respondents who report car, truck, or van as their means of transportation to work has been an integral part of the transportation data obtained in the census. However, the 1980 data on detailed ride-sharing arrangements were not widely used; the basic information needed is whether the person drives alone or is a member of a carpool and the number of persons in the carpool. Therefore, for 1990: (1) the 1980 question on carpooling arrangements (Q24c) should be dropped, (2) the question on number of persons in the carpool (Q24d) should be retained with a new response category for "Drove alone," and (3) the 1990 version of the carpooling question should include categories for "7 to 9" persons and "10 or more" persons instead of "7 or more" persons as in 1980. The 1990 question would get the required information while allowing calculation of "persons per vehicle," an important statistic for evaluating the success of carpooling programs in transportation planning. The carpooling question included in the 1990 census should refer to the commuting arrangement that the respondent usually used to get to work "last week" and produce small-area data in combination with the place-of-work and means of transportation questions.

Specific questions pertaining to carpooling were first included in the 1980 census in response to gasoline shortages in the early 1970s. Some data concerning carpooling were also collected in 1960 and 1970 with the "auto-driver" and "auto-passenger" categories listed in the means of transportation item.

Travel Time to Work

In order to get more precise data on travel time, the 1980 question (Q24a) should be modified for the 1990 census to ask for the repondent's time of departure for work and time of arrival at work instead of total minutes to work. Such a modification will also provide important information on peak hours of travel, a key transportation indicator for small-area traffic flows. The travel time question included in the 1990 census should refer to the time of day that the respondent usually left home and arrived at work on a typical day "last week" and produce small-area data in combination with the other journey-to-work items.

A question on travel time to work was first asked in the decennial census in 1980. Since many commuters do not accurately know the exact distance of their trip from home to work (for example, public transit or carpool riders who never drive to work), travel time has been shown to be a better indicator of approximate distances to work and the relative efficiency of the various transportation modes. Like carpooling data, travel time information has become an integral part of the statistical profile of transportation movements that are portrayed by the census.

Disability

As part of the question on disability status (Q19), the 1980 census obtained information on the number of persons aged 16 and over who had a disabling condition that limited or prevented their use of public transportation. The data that resulted from this question underestimated the number of persons with "public transportation disabilities" and did not meet agency needs. Furthermore, data are needed to identify those persons whose handicap affects their ability to drive a car as well as to use public transit.

In order to obtain more accurate data on disability, the 1990 census should include a question or questions that identify the number of disabled persons by type of disability if a valid question on the kinds of activities that their handicap limits or prevents cannot be developed. Agency analysts can make the necessary inferences as to transportation-related limitations based on the type of disability. Disability data are needed for small areas for aggregation into user-defined analysis zones.

Number of Vehicles Available to the Household

Information on the number of vehicles per household for small geographic areas remains a critical data need for transportation-related programs. However, most planning and policy formulation activities do not require data that differentiate between cars and trucks and vans. Therefore, the 1980 census questions on automobiles available (QH28) and trucks and vans available (QH29) should be combined into one question for the 1990 census that asks for the total number of cars, trucks, and vans available to the household. The question should include more detailed categories for the number of vehicles available larger than two (e.g., 3, 4, 5, or more) rather than "3 or more" as in 1980. Data on the number of vehicles available should be produced for small areas for aggregation into user-defined analysis zones.

Questions on the number of vehicles available to each household have been included in the decennial census since 1960 when a question pertaining to autombiles was first asked. In 1980 a companion question on the number of trucks or vans available was added.

LARGE-AREA DATA NEEDS

Number of Miles Driven Per Driver in the Last Year

DOT currently allocates funds to the states on the basis of a formula which uses a state's total highway and road mileage as an important factor indicative of the amount of use of its highways and roads. However, in recent years this characteristic has been viewed with increasing skepticism by Federal and state policy makers as an inaccurate measure of total travel. Instead, it has been suggested that annual vehicle miles of travel by residents of the state would be a more equitable funding criterion. Such data are not available.

In order to meet the need for these data, the large-area sample of the 1990 census should include a question which asks for the number of miles driven in the last year by each licensed driver in the household. Information on annual miles driven is currently collected for the nation as a whole by the Nationwide Personal Transportation Study, but its sample size is too small to provide state estimates.

Type and Number of Motor Vehicles Available to the Household

Data on the type and number of specific vehicles (e.g., automobiles, passenger vans, pickup trucks, motorcycles, etc.) available to each household are needed to make forecasts of expected Federal gasoline tax revenues by state. The number of vehicles by type in the state multiplied by the average annual vehicle miles of travel of each type of vehicle would yield total annual miles of travel. Total miles of travel divided by the average miles per gallon of the vehicle type would yield an estimate of total gallons of gasoline. Finally, total estimated gasoline consumption multiplied by $.09 per gallon would give total estimated Federal gasoline tax revenues by state.

In order to meet the need for these data, the large-area sample of the 1990 census should include a question which asks for the types and number of motor vehicles available to each household. This information is currently collected for the nation as a whole by the Nationwide Personal Transportation Study, but its sample size is too small to provide state estimates.

DOT PROGRAMS REQUIRING TRANSPORTATION DATA FROM THE 1990 CENSUS

Federal-Aid Highways--Transportation Planning in Urban Areas (23 U.S.C. 134)

Census data are required by FHWA to fulfill its responsibility to cooperate with state and local governments in the development of transportation plans and programs formulated on the basis of transportation needs with due consideration to comprehensive long-range land use plans, development objectives, and overall social, economic, environmental, system performance, and energy conservation goals and objectives, and with due consideration to their probable effect on the future development of urbanized areas. The data are also required to plan national transportation policy.

Other Highways--Safer Off-System Roads (23 U.S.C. 219)

Census data are required by FHWA in conjuction with grants to states for projects to construct, reconstruct, or improve off-system (not a Federal highway) roads.

Highway Safety (23 U.S.C. 402)

Census data are required by NHTSA and FHWA for planning highway safety programs.

Highway Research Program (23 U.S.C. 307(b))

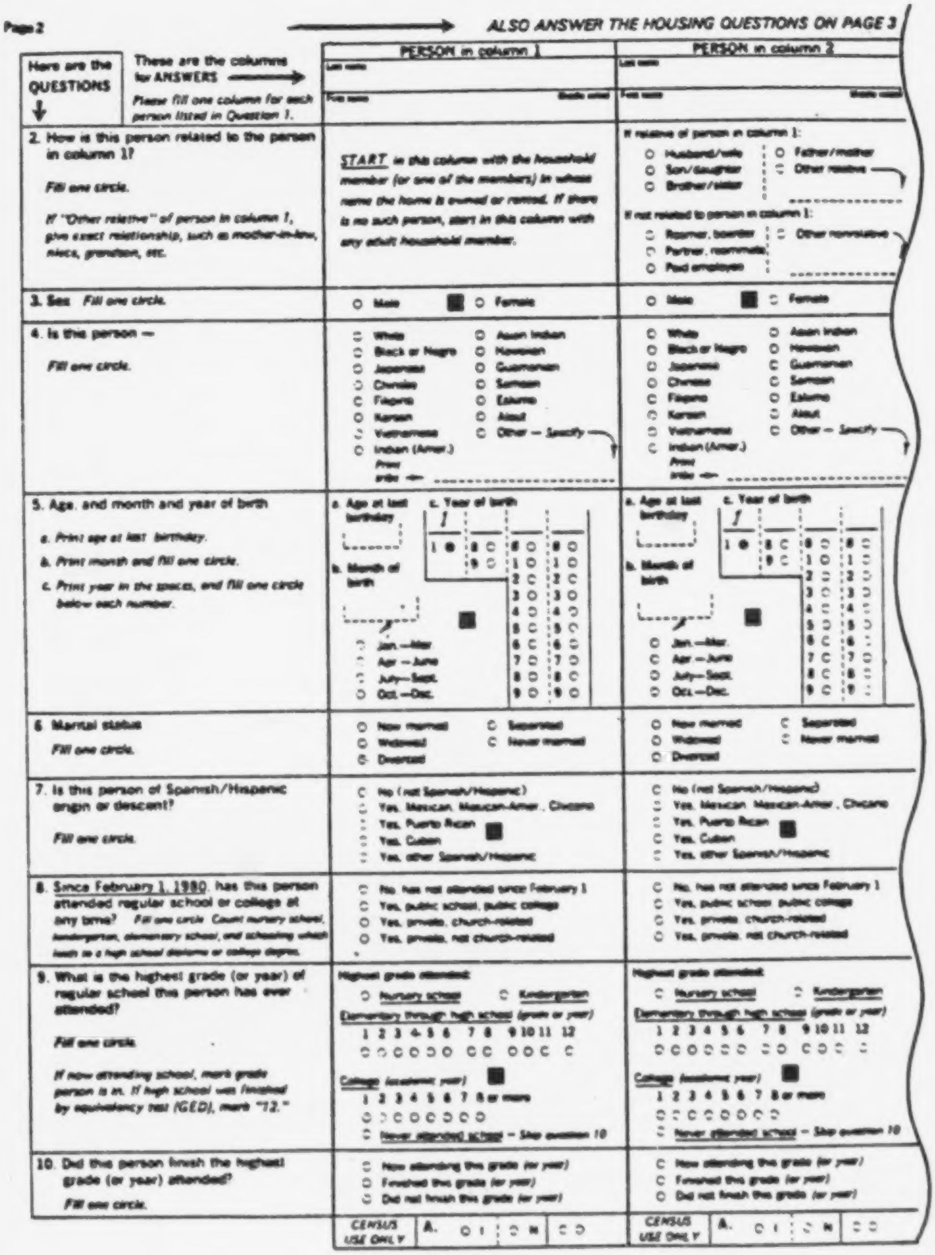
Census data are required by FHWA in the highway research program to "identify and measure, quantitatively and qualitatively, those factors which relate to economic, social, environmental, and other impacts of highway projects."

Evaluating Highway Needs and Program Development (23 U.S.C. 307(e))

Census data are required by FHWA to fulfill its responsibility to submit a report on the nation's highway needs to Congress every 2 years. The data are used in determining future highway programs in light of future highway needs.

Federal-Aid Highways--Carpool and Vanpool Projects (23 U.S.C. 146)

Census data are required by FHWA for evaluating the National Ridesharing Program, approving Federal assistance to projects designed to encourage use of carpools and vanpools, and evaluating the effectiveness of state and local programs. Includes the provision for providing carpooling opportunities for the elderly and handicapped.



Page 2 → *ALSO ANSWER THE HOUSING QUESTIONS ON PAGE 3*

Here are the QUESTIONS ↓	These are the columns for ANSWERS → *Please fill one column for each person listed in Question 1.*	
	PERSON in column 1 Last name First name Middle initial	PERSON in column 2 Last name First name Middle initial
2. How is this person related to the person in column 1? *Fill one circle.* *If "Other relative" of person in column 1, give exact relationship, such as mother-in-law, niece, grandson, etc.*	*START in this column with the household member (or one of the members) in whose name the home is owned or rented. If there is no such person, start in this column with any adult household member.*	If relative of person in column 1: ○ Husband/wife ○ Son/daughter ○ Brother/sister ○ Father/mother ○ Other relative If not related to person in column 1: ○ Roomer, boarder ○ Partner, roommate ○ Paid employee ○ Other nonrelative
3. Sex *Fill one circle.*	○ Male ○ Female	○ Male ○ Female
4. Is this person — *Fill one circle.*	○ White ○ Black or Negro ○ Japanese ○ Chinese ○ Filipino ○ Korean ○ Vietnamese ○ Indian (Amer.) *Print tribe* → ○ Asian Indian ○ Hawaiian ○ Guamanian ○ Samoan ○ Eskimo ○ Aleut ○ Other — *Specify*	○ White ○ Black or Negro ○ Japanese ○ Chinese ○ Filipino ○ Korean ○ Vietnamese ○ Indian (Amer.) *Print tribe* → ○ Asian Indian ○ Hawaiian ○ Guamanian ○ Samoan ○ Eskimo ○ Aleut ○ Other — *Specify*
5. Age, and month and year of birth *a. Print age at last birthday.* *b. Print month and fill one circle.* *c. Print year in the spaces, and fill one circle below each number.*	a. Age at last birthday b. Month of birth ○ Jan.—Mar. ○ Apr.—June ○ July—Sept. ○ Oct.—Dec. c. Year of birth 1 ● 8 ○ 0 ○ 0 ○ 9 ○ 1 ○ 1 ○ 2 ○ 2 ○ 3 ○ 3 ○ 4 ○ 4 ○ 5 ○ 5 ○ 6 ○ 6 ○ 7 ○ 7 ○ 8 ○ 8 ○ 9 ○ 9 ○	a. Age at last birthday b. Month of birth ○ Jan.—Mar. ○ Apr.—June ○ July—Sept. ○ Oct.—Dec. c. Year of birth 1 ● 8 ○ 0 ○ 0 ○ 9 ○ 1 ○ 1 ○ 2 ○ 2 ○ 3 ○ 3 ○ 4 ○ 4 ○ 5 ○ 5 ○ 6 ○ 6 ○ 7 ○ 7 ○ 8 ○ 8 ○ 9 ○ 9 ○
6. Marital status *Fill one circle.*	○ Now married ○ Widowed ○ Divorced ○ Separated ○ Never married	○ Now married ○ Widowed ○ Divorced ○ Separated ○ Never married
7. Is this person of Spanish/Hispanic origin or descent? *Fill one circle.*	○ No (not Spanish/Hispanic) ○ Yes, Mexican, Mexican-Amer., Chicano ○ Yes, Puerto Rican ○ Yes, Cuban ○ Yes, other Spanish/Hispanic	○ No (not Spanish/Hispanic) ○ Yes, Mexican, Mexican-Amer., Chicano ○ Yes, Puerto Rican ○ Yes, Cuban ○ Yes, other Spanish/Hispanic
8. Since February 1, 1980, has this person attended regular school or college at any time? *Fill one circle. Count nursery school, kindergarten, elementary school, and schooling which leads to a high school diploma or college degree.*	○ No, has not attended since February 1 ○ Yes, public school, public college ○ Yes, private, church-related ○ Yes, private, not church-related	○ No, has not attended since February 1 ○ Yes, public school, public college ○ Yes, private, church-related ○ Yes, private, not church-related
9. What is the highest grade (or year) of regular school this person has ever attended? *Fill one circle.* *If now attending school, mark grade person is in. If high school was finished by equivalency test (GED), mark "12."*	Highest grade attended: ○ Nursery school ○ Kindergarten Elementary through high school *(grade or year)* 1 2 3 4 5 6 7 8 9 10 11 12 ○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○ College *(academic year)* 1 2 3 4 5 6 7 8 or more ○ ○ ○ ○ ○ ○ ○ ○ ○ Never attended school — *Skip question 10*	Highest grade attended: ○ Nursery school ○ Kindergarten Elementary through high school *(grade or year)* 1 2 3 4 5 6 7 8 9 10 11 12 ○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○ College *(academic year)* 1 2 3 4 5 6 7 8 or more ○ ○ ○ ○ ○ ○ ○ ○ ○ Never attended school — *Skip question 10*
10. Did this person finish the highest grade (or year) attended? *Fill one circle.*	○ Now attending this grade *(or year)* ○ Finished this grade *(or year)* ○ Did not finish this grade *(or year)*	○ Now attending this grade *(or year)* ○ Finished this grade *(or year)* ○ Did not finish this grade *(or year)*
	CENSUS USE ONLY A. ○ I ○ N ○ O	*CENSUS USE ONLY* A. ○ I ○ N ○ O

Federal-Aid Highways--Economic Growth Center Development Highways (23 U.S.C. 143)

Census data are required by FHWA for planning and in making grants to states to construct, reconstruct, or improve highways that encourage the development of growth centers to revitalize and diversify the economy of rural areas and smaller communities, enhance industrial growth, and facilitate the mobility of labor in sparsely populated areas.

Federal-Aid Highways--Apportionment (23 U.S.C. 104)

Census data are required by FHWA for apportionment of funds to the states and for forecasting expected Federal gasoline tax revenues.

Urban Mass Transportation Administration--Long-Range Planning and Technical Studies (49 U.S.C. 1607)

Census data are required by UMTA to fulfill its responsibility to cooperate with state and local governments in the development of transportation plans and programs formulated on the basis of transportation needs with due consideration to comprehensive long-range land use plans, development objectives, and overall social, economic, environmental, system performance, and energy conservation goals and objectives, and with due consideration to their probable effect on the future development of urbanized areas. The data are also required to plan national transportation policy.

Urban Mass Transit Grant Program (49 U.S.C. 1604)

Census data are required by UMTA for evaluation of plans for transit investments in urbanized areas.

Urban Mass Transportation Administration--Formula Grants Program for Areas Other Than Urbanized Areas (49 U.S.C. 1614)

Census data are required by UMTA for planning, evaluation, and technical assistance in conjuction with public transit projects in areas other than urbanized areas.

Urban Mass Transportation Administration--Discretionary Grant or Loan Program (49 U.S.C. 1602)

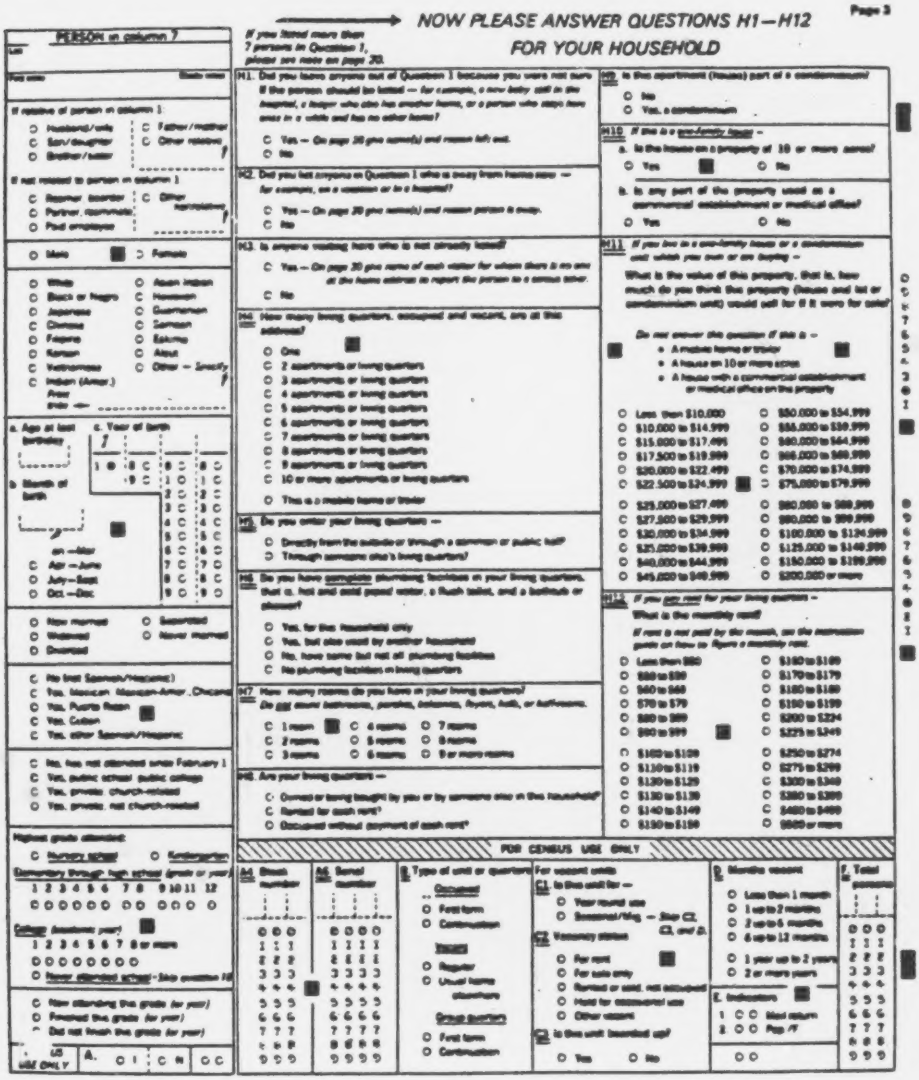
Census data are required by UMTA for the development and evaluation of plans for transit investments in urbanized areas.

Urban Mass Transportation Administration--Block Grants (49 U.S.C. 1607)

Census data are required by UMTA for the development and evaluation of plans for transit investments in urbanized areas.

Urban Mass Transportation Administration--Performance Reports (PL97-424, Section 310)

Census data are required by UMTA in the development of biennial reports to Congress on transit performance and needs.

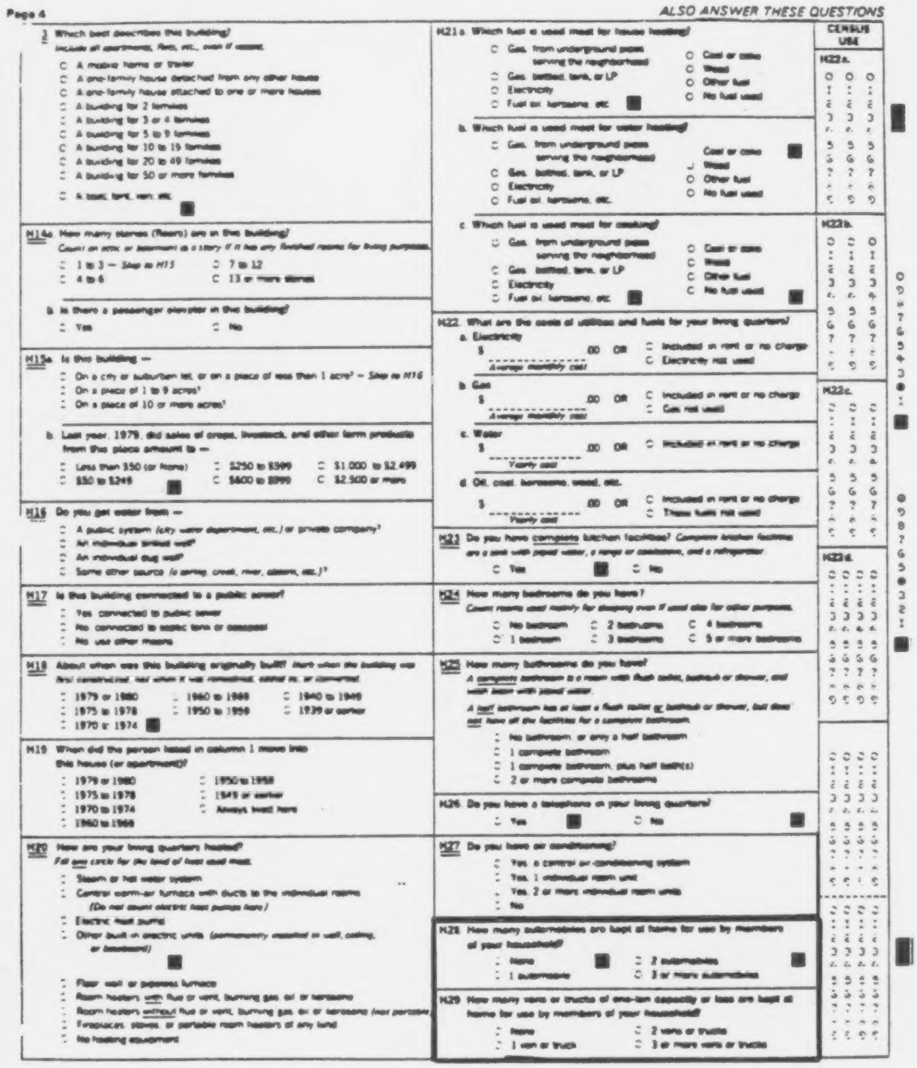


Page 3

NOW PLEASE ANSWER QUESTIONS H1—H12

FOR YOUR HOUSEHOLD

FOR CENSUS USE ONLY



Page 4

ALSO ANSWER THESE QUESTIONS

3 Which best describes this building?
Include all apartments, flats, etc., even if vacant.
○ A mobile home or trailer
○ A one-family house detached from any other house
○ A one-family house attached to one or more houses
○ A building for 2 families
○ A building for 3 or 4 families
○ A building for 5 to 9 families
○ A building for 10 to 19 families
○ A building for 20 to 49 families
○ A building for 50 or more families
○ A boat, tent, van, etc.

H14a. How many stories (floors) are in this building?
Count an attic or basement as a story if it has any finished rooms for living purposes.
○ 1 to 3 — *Skip to H15* ○ 7 to 12
○ 4 to 6 ○ 13 or more stories

b. Is there a passenger elevator in this building?
○ Yes ○ No

H15a. Is this building —
○ On a city or suburban lot, or on a place of less than 1 acre? — *Skip to H16*
○ On a place of 1 to 9 acres?
○ On a place of 10 or more acres?

b. Last year, 1979, did sales of crops, livestock, and other farm products from this place amount to —
○ Less than $50 (or None) ○ $250 to $599 ○ $1,000 to $2,499
○ $50 to $249 ○ $600 to $999 ○ $2,500 or more

H16 Do you get water from —
○ A public system *(city water department, etc.)* or private company?
○ An individual drilled well?
○ An individual dug well?
○ Some other source *(a spring, creek, river, cistern, etc.)*?

H17 Is this building connected to a public sewer?
○ Yes, connected to public sewer
○ No, connected to septic tank or cesspool
○ No, use other means

H18 About when was this building originally built? *Mark when the building was first constructed, not when it was remodeled, added to, or converted.*
○ 1979 or 1980 ○ 1960 to 1969 ○ 1940 to 1949
○ 1975 to 1978 ○ 1950 to 1959 ○ 1939 or earlier
○ 1970 to 1974

H19 When did the person listed in column 1 move into this house (or apartment)?
○ 1979 or 1980 ○ 1950 to 1959
○ 1975 to 1978 ○ 1949 or earlier
○ 1970 to 1974 ○ Always lived here
○ 1960 to 1969

H20 How are your living quarters heated?
Fill one circle for the kind of heat used most.
○ Steam or hot water system
○ Central warm-air furnace with ducts to the individual rooms *(Do not count electric heat pumps here)*
○ Electric heat pump
○ Other built-in electric units *(permanently installed in wall, ceiling, or baseboard)*
○ Floor, wall, or pipeless furnace
○ Room heaters with flue or vent, burning gas, oil, or kerosene
○ Room heaters without flue or vent, burning gas, oil, or kerosene *(not portable)*
○ Fireplaces, stoves, or portable room heaters of any kind
○ No heating equipment

H21a. Which fuel is used most for house heating?
○ Gas: from underground pipes serving the neighborhood ○ Coal or coke
○ Gas: bottled, tank, or LP ○ Wood
○ Electricity ○ Other fuel
○ Fuel oil, kerosene, etc. ○ No fuel used

b. Which fuel is used most for water heating?
○ Gas: from underground pipes serving the neighborhood ○ Coal or coke
○ Gas: bottled, tank, or LP ○ Wood
○ Electricity ○ Other fuel
○ Fuel oil, kerosene, etc. ○ No fuel used

c. Which fuel is used most for cooking?
○ Gas: from underground pipes serving the neighborhood ○ Coal or coke
○ Gas: bottled, tank, or LP ○ Wood
○ Electricity ○ Other fuel
○ Fuel oil, kerosene, etc. ○ No fuel used

H22. What are the costs of utilities and fuels for your living quarters?

a. Electricity
$ ______ .00 *Average monthly cost* OR ○ Included in rent or no charge ○ Electricity not used

b. Gas
$ ______ .00 *Average monthly cost* OR ○ Included in rent or no charge ○ Gas not used

c. Water
$ ______ .00 *Yearly cost* OR ○ Included in rent or no charge

d. Oil, coal, kerosene, wood, etc.
$ ______ .00 *Yearly cost* OR ○ Included in rent or no charge ○ These fuels not used

H23 Do you have complete kitchen facilities? *Complete kitchen facilities are a sink with piped water, a range or cookstove, and a refrigerator.*
○ Yes ○ No

H24 How many bedrooms do you have?
Count rooms used mainly for sleeping even if used also for other purposes.
○ No bedroom ○ 2 bedrooms ○ 4 bedrooms
○ 1 bedroom ○ 3 bedrooms ○ 5 or more bedrooms

H25 How many bathrooms do you have?
A complete bathroom is a room with flush toilet, bathtub or shower, and wash basin with piped water.
A half bathroom has at least a flush toilet or bathtub or shower, but does not have all the facilities for a complete bathroom.
○ No bathroom, or only a half bathroom
○ 1 complete bathroom
○ 1 complete bathroom, plus half bath(s)
○ 2 or more complete bathrooms

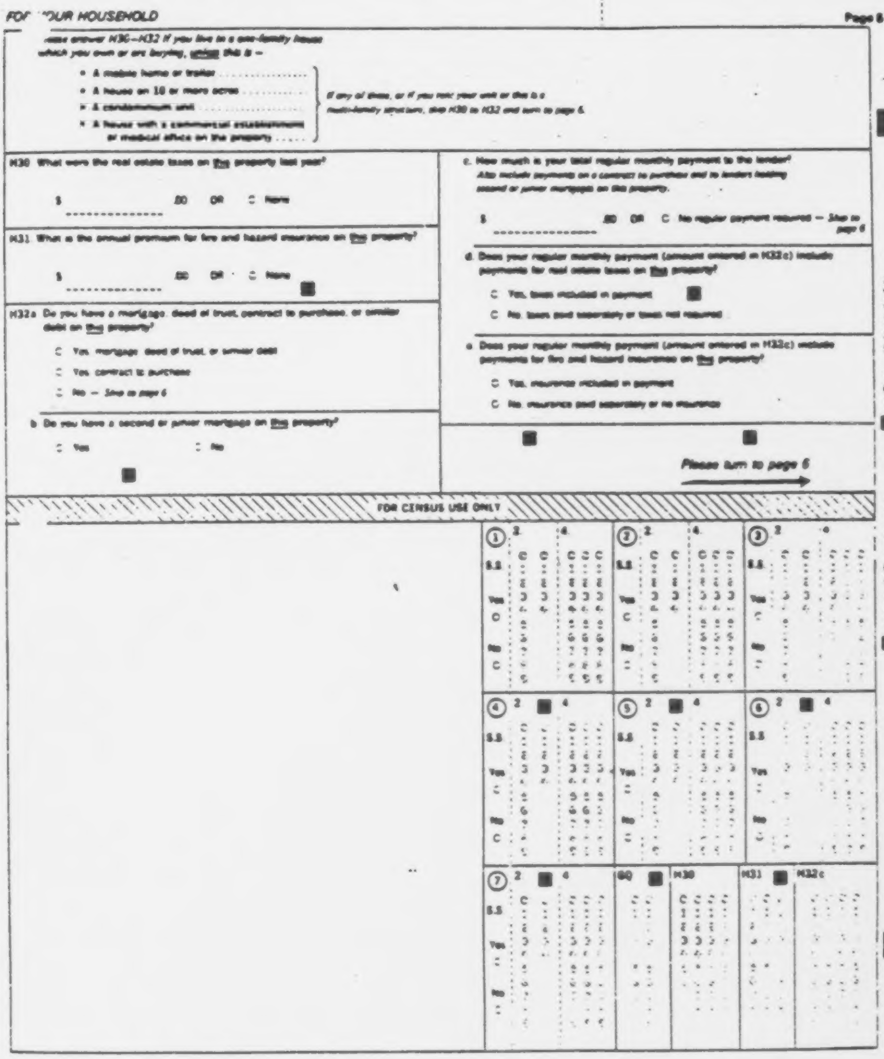
H26. Do you have a telephone in your living quarters?
○ Yes ○ No

H27 Do you have air conditioning?
○ Yes, a central air-conditioning system
○ Yes, 1 individual room unit
○ Yes, 2 or more individual room units
○ No

H28 How many automobiles are kept at home for use by members of your household?
○ None ○ 2 automobiles
○ 1 automobile ○ 3 or more automobiles

H29 How many vans or trucks of one-ton capacity or less are kept at home for use by members of your household?
○ None ○ 2 vans or trucks
○ 1 van or truck ○ 3 or more vans or trucks

CENSUS USE
H22a.
H22b.
H22c.
H22d.



FOR YOUR HOUSEHOLD

Page 5

Please answer H30–H32 if you live in a one-family house which you own or are buying, *unless* this is –

- A mobile home or trailer
- A house on 10 or more acres
- A condominium unit
- A house with a commercial establishment or medical office on the property

If any of these, or if you rent your unit or this is a multi-family structure, skip H30 to H32 and turn to page 6.

H30 What were the real estate taxes on this property last year?

$ ______ .00 OR ○ None

H31 What is the annual premium for fire and hazard insurance on this property?

$ ______ .00 OR ○ None

H32a Do you have a mortgage, deed of trust, contract to purchase, or similar debt on this property?

○ Yes, mortgage, deed of trust, or similar debt

○ Yes, contract to purchase

○ No – *Skip to page 6*

b Do you have a second or junior mortgage on this property?

○ Yes ○ No

c. How much is your total regular monthly payment to the lender?

Also include payments on a contract to purchase and to lenders holding second or junior mortgages on this property.

$ ______ .00 OR ○ No regular payment required – *Skip to page 6*

d. Does your regular monthly payment (amount entered in H32c) include payments for real estate taxes on this property?

○ Yes, taxes included in payment

○ No, taxes paid separately or taxes not required

e Does your regular monthly payment (amount entered in H32c) include payments for fire and hazard insurance on this property?

○ Yes, insurance included in payment

○ No, insurance paid separately or no insurance

Please turn to page 6 →

FOR CENSUS USE ONLY

① 2 4 S.S. Yes No

② 2 4 S.S. Yes No

③ 2 4 S.S. Yes No

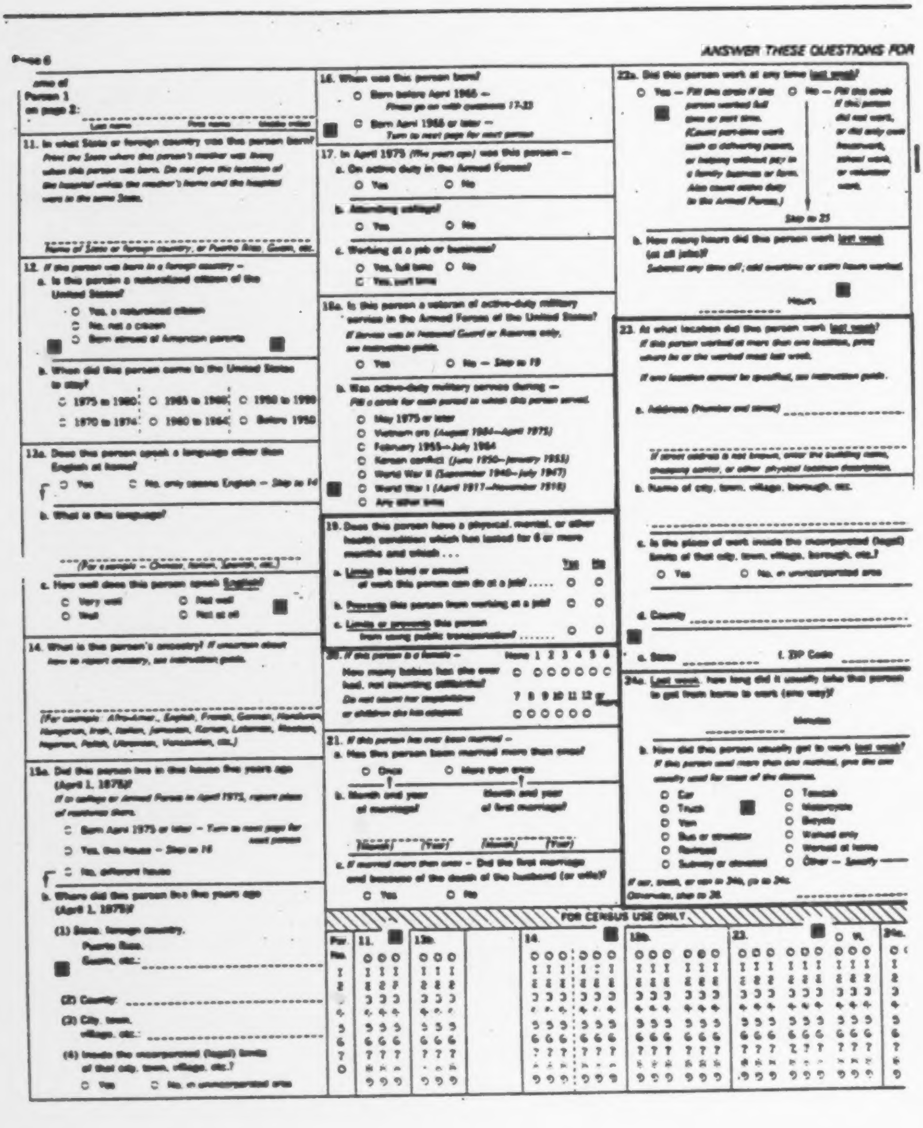
④ 2 4 S.S. Yes No

⑤ 2 4 S.S. Yes No

⑥ 2 4 S.S. Yes No

⑦ 2 4 S.S. Yes No

GQ H30 H31 H32c



Page 6

ANSWER THESE QUESTIONS FOR

Name of Person 1 on page 2: ---------- Last name First name Middle initial

11. In what State or foreign country was this person born?
Print the State where this person's mother was living when this person was born. Do not give the location of the hospital unless the mother's home and the hospital were in the same State.
---------- *Name of State or foreign country, or Puerto Rico, Guam, etc.*

12. *If this person was born in a foreign country —*
a. Is this person a naturalized citizen of the United States?
○ Yes, a naturalized citizen
○ No, not a citizen
○ Born abroad of American parents

b. When did this person come to the United States to stay?
○ 1975 to 1980 ○ 1965 to 1969 ○ 1950 to 1959
○ 1970 to 1974 ○ 1960 to 1964 ○ Before 1950

13a. Does this person speak a language other than English at home?
○ Yes ○ No, only speaks English — *Skip to 14*

b. What is this language?
---------- *(For example — Chinese, Italian, Spanish, etc.)*

c. How well does this person speak English?
○ Very well ○ Not well
○ Well ○ Not at all

14. What is this person's ancestry? *If uncertain about how to report ancestry, see instruction guide.*
---------- *(For example: Afro-Amer., English, French, German, Honduran, Hungarian, Irish, Italian, Jamaican, Korean, Lebanese, Mexican, Nigerian, Polish, Ukrainian, Venezuelan, etc.)*

15a. Did this person live in this house five years ago (April 1, 1975)?
If in college or Armed Forces in April 1975, report place of residence there.
○ Born April 1975 or later — *Turn to next page for next person*
○ Yes, this house — *Skip to 16*
○ No, different house

b. Where did this person live five years ago (April 1, 1975)?
(1) State, foreign country, Puerto Rico, Guam, etc.: ----------
(2) County: ----------
(3) City, town, village, etc.: ----------
(4) Inside the incorporated (legal) limits of that city, town, village, etc.?
○ Yes ○ No, in unincorporated area

16. When was this person born?
○ Born before April 1965 — *Please go on with questions 17-33*
○ Born April 1965 or later — *Turn to next page for next person*

17. In April 1975 *(five years ago)* was this person —
a. On active duty in the Armed Forces?
○ Yes ○ No
b. Attending college?
○ Yes ○ No
c. Working at a job or business?
○ Yes, full time ○ No
○ Yes, part time

18a. Is this person a veteran of active-duty military service in the Armed Forces of the United States?
If service was in National Guard or Reserves only, see instruction guide.
○ Yes ○ No — *Skip to 19*

b. Was active-duty military service during —
Fill a circle for each period in which this person served.
○ May 1975 or later
○ Vietnam era *(August 1964—April 1975)*
○ February 1955—July 1964
○ Korean conflict *(June 1950—January 1955)*
○ World War II *(September 1940—July 1947)*
○ World War I *(April 1917—November 1918)*
○ Any other time

19. Does this person have a physical, mental, or other health condition which has lasted for 6 or more months and which . . .

	Yes	No
a. Limits the kind or amount of work this person can do at a job?	○	○
b. Prevents this person from working at a job?	○	○
c. Limits or prevents this person from using public transportation?	○	○

20. *If this person is a female —*
How many babies has she ever had, not counting stillbirths?
Do not count her stepchildren or children she has adopted.

None	1	2	3	4	5	6
○	○	○	○	○	○	○
7	8	9	10	11	12 or more	
○	○	○	○	○	○	

21. *If this person has ever been married —*
a. Has this person been married more than once?
○ Once ○ More than once
b. Month and year of marriage? Month and year of first marriage?
---------- *(Month) (Year)* ---------- *(Month) (Year)*
c. *If married more than once —* Did the first marriage end because of the death of the husband (or wife)?
○ Yes ○ No

22a. Did this person work at any time last week?
○ Yes — *Fill this circle if this person worked full time or part time. (Count part-time work such as delivering papers, or helping without pay in a family business or farm. Also count active duty in the Armed Forces.)*
○ No — *Fill this circle if this person did not work, or did only own housework, school work, or volunteer work.* — *Skip to 25*

b. How many hours did this person work last week (at all jobs)?
Subtract any time off; add overtime or extra hours worked.
---------- Hours

23. At what location did this person work last week?
If this person worked at more than one location, print where he or she worked most last week.
If one location cannot be specified, see instruction guide.
a. Address (Number and street) ----------
If street address is not known, enter the building name, shopping center, or other physical location description.
b. Name of city, town, village, borough, etc.
----
c. Is the place of work inside the incorporated (legal) limits of that city, town, village, borough, etc.?
○ Yes ○ No, in unincorporated area
d. County ----------
e. State ---------- f. ZIP Code ----------

24a. Last week, how long did it usually take this person to get from home to work (one way)?
---------- Minutes

b. How did this person usually get to work last week?
If this person used more than one method, give the one usually used for most of the distance.
○ Car ○ Taxicab
○ Truck ○ Motorcycle
○ Van ○ Bicycle
○ Bus or streetcar ○ Walked only
○ Railroad ○ Worked at home
○ Subway or elevated ○ Other — *Specify* ----------
If car, truck, or van in 24b, go to 24c. Otherwise, skip to 28.

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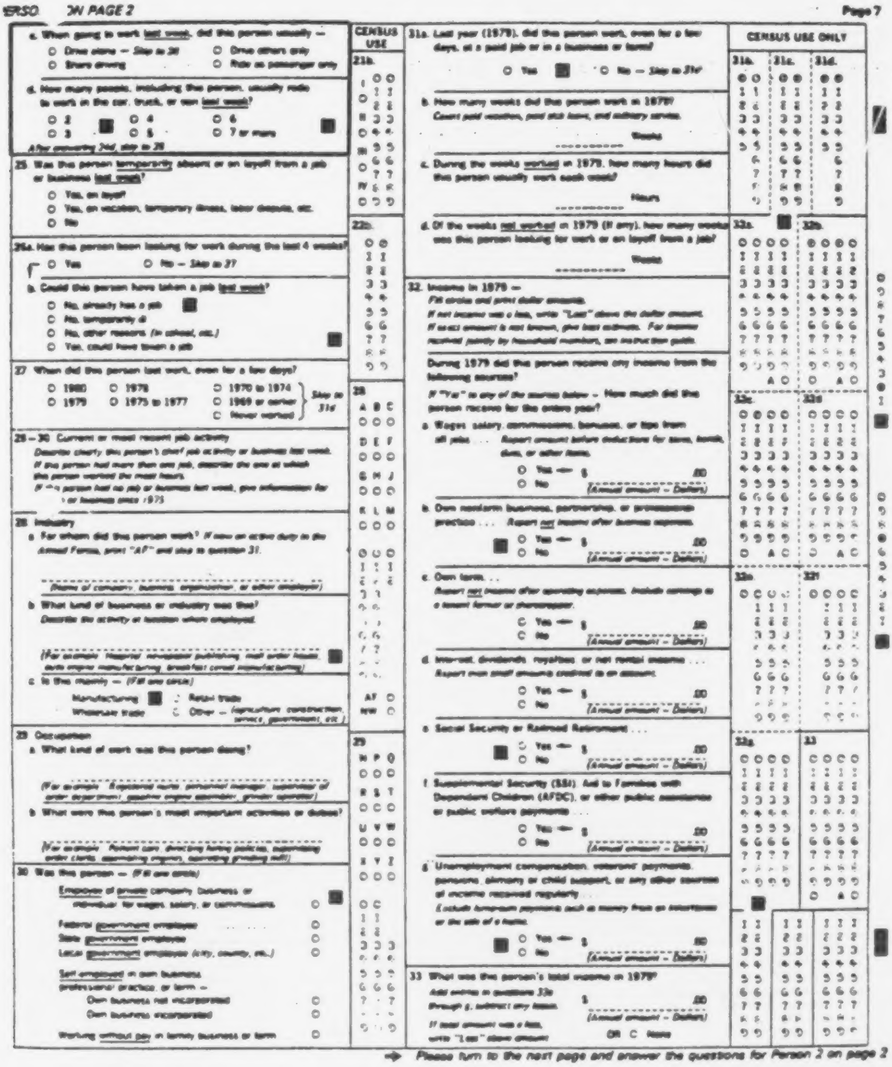
Per. No. | 11. | 13b. | 14. | 15b. | 23. | 24a.



ERSO ON PAGE 2 — Page 7

c. When going to work last week, did this person usually —
○ Drive alone — Skip to 28
○ Drive others only
○ Share driving
○ Ride as passenger only

d. How many people, including this person, usually rode to work in the car, truck, or van last week?
○ 2 ○ 4 ○ 6
○ 3 ○ 5 ○ 7 or more
After answering 24d, skip to 28

25. Was this person temporarily absent or on layoff from a job or business last week?
○ Yes, on layoff
○ Yes, on vacation, temporary illness, labor dispute, etc.
○ No

26a. Has this person been looking for work during the last 4 weeks?
○ Yes ○ No — Skip to 27

b. Could this person have taken a job last week?
○ No, already has a job
○ No, temporarily ill
○ No, other reasons (in school, etc.)
○ Yes, could have taken a job

27. When did this person last work, even for a few days?
○ 1980 ○ 1978 ○ 1970 to 1974
○ 1979 ○ 1975 to 1977 ○ 1969 or earlier
○ Never worked
} Skip to 31d

28 – 30. Current or most recent job activity
Describe clearly this person's chief job activity or business last week. If this person had more than one job, describe the one at which this person worked the most hours. If this person had no job or business last week, give information for last job or business since 1975.

28. Industry
a. For whom did this person work? *If now on active duty in the Armed Forces, print "AF" and skip to question 31.*
(Name of company, business, organization, or other employer)

b. What kind of business or industry was this?
Describe the activity at location where employed.
(For example: Hospital, newspaper publishing, mail order house, auto engine manufacturing, breakfast cereal manufacturing)

c. Is this mainly — *(Fill one circle)*
○ Manufacturing ○ Retail trade
○ Wholesale trade ○ Other — *(agriculture, construction, service, government, etc.)*

29. Occupation
a. What kind of work was this person doing?
(For example: Registered nurse, personnel manager, supervisor of order department, gasoline engine assembler, grinder operator)

b. What were this person's most important activities or duties?
(For example: Patient care, directing hiring policies, supervising order clerks, assembling engines, operating grinding mill)

30. Was this person — *(Fill one circle)*
Employee of private company, business, or individual, for wages, salary, or commissions ○
Federal government employee ○
State government employee ○
Local government employee (city, county, etc.) ○
Self-employed in own business, professional practice, or farm —
Own business not incorporated ○
Own business incorporated ○
Working without pay in family business or farm ○

CENSUS USE — 21b. 22b. 28 (A B C, D E F, G H J, K L M, AF, NW) 29 (N P Q, R S T, U V W, X Y Z)

31a. Last year (1979), did this person work, even for a few days, at a paid job or in a business or farm?
○ Yes ○ No — Skip to 31d

b. How many weeks did this person work in 1979?
Count paid vacation, paid sick leave, and military service.
Weeks

c. During the weeks worked in 1979, how many hours did this person usually work each week?
Hours

d. Of the weeks not worked in 1979 (if any), how many weeks was this person looking for work or on layoff from a job?
Weeks

32. Income in 1979 —
Fill circles and print dollar amounts.
If net income was a loss, write "Loss" above the dollar amount.
If exact amount is not known, give best estimate. For income received jointly by household members, see instruction guide.

During 1979 did this person receive any income from the following sources?

If "Yes" to any of the sources below — How much did this person receive for the entire year?

a. Wages, salary, commissions, bonuses, or tips from all jobs . . . *Report amount before deductions for taxes, bonds, dues, or other items.*
○ Yes → $ .00
○ No *(Annual amount — Dollars)*

b. Own nonfarm business, partnership, or professional practice . . . *Report net income after business expenses.*
○ Yes → $ .00
○ No *(Annual amount — Dollars)*

c. Own farm . . .
Report net income after operating expenses. Include earnings as a tenant farmer or sharecropper.
○ Yes → $ .00
○ No *(Annual amount — Dollars)*

d. Interest, dividends, royalties, or net rental income . . .
Report even small amounts credited to an account.
○ Yes → $ .00
○ No *(Annual amount — Dollars)*

e. Social Security or Railroad Retirement . . .
○ Yes → $ .00
○ No *(Annual amount — Dollars)*

f. Supplemental Security (SSI), Aid to Families with Dependent Children (AFDC), or other public assistance or public welfare payments . . .
○ Yes → $ .00
○ No *(Annual amount — Dollars)*

g. Unemployment compensation, veterans' payments, pensions, alimony or child support, or any other sources of income received regularly . . .
Exclude lump-sum payments such as money from an inheritance or the sale of a home.
○ Yes → $ .00
○ No *(Annual amount — Dollars)*

33. What was this person's total income in 1979?
Add entries in questions 32a through g; subtract any losses.
$ .00 *(Annual amount — Dollars)*
If total amount was a loss, write "Loss" above amount.
OR ○ None

CENSUS USE ONLY — 31b. 31c. 31d. 32a. 32b. 32c. 32d. 32e. 32f. 32g. 33

→ *Please turn to the next page and answer the questions for Person 2 on page 2*

Senator **Sarbanes**. Following Ms. Gramm's testimony, we will hear from just a few of the many users whose work, and in many cases public responsibilities, would be gravely compromised if the OMB proposals were carried out.

First, we will hear from a panel of representatives of the public sector and then from a panel of private sector experts, representing the home builders, the corporate community, the AFL–CIO, and others.

Congressman Claude Pepper has asked me to include in my remarks his very deep concern about this matter, particularly as to how the possible cuts in the census form might have an impact on the aging population. Unfortunately, he is attending another meeting this morning and will not be able to present but will be submitting a statement for the record.

[The statement follows:]

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Claude Pepper

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STATEMENT OF THE HONORABLE CLAUDE PEPPER
CHAIRMAN, SUBCOMMITTEE ON HEALTH AND LONG-TERM CARE, HOUSE SELECT COMMITTEE ON AGING
FOR INCLUSION IN THE HEARING RECORD OF THE JOINT ECONOMIC COMMITTEE
AUGUST 7, 1987

Mr. Chairman, I want to commend you for holding this very important hearing. I view the matter of data sufficiency pertaining to such major domestic concerns as employment, housing, transportation, migration and fertility as pivotal for the Nation and the Congress, particularly as it affects short- and long-term planning.

I stand in strong opposition to the proposal by the Office of Management and Budget (OMB) to delete certain questions from the 100 percent decennial questionnaire and to shift a very significant number of other items from the full to the sample (long form) questionnaire.

I would like to address my remarks to three areas:

(1) the legal basis for deleting items or moving items from the 100 percent form to the sample questionnaire, particularly with respect to housing;

(2) the importance of these Census items (at risk) to the administration and evaluation of Federal programs, and to the allocation of Federal funds; and

(3) the unique nature of the decennial census.

First, it is my understanding that the Paperwork Reduction Act is being used by the Office of Management and Budget as the legal basis for the proposal to delete and make other substantive changes to the decennial census. Let me focus my initial remarks on the

Census of Housing and to some extent on the migration item. Housing is very largely a measure of the relationship between the number of people and the effective supply of housing in a given location. Obviously, the housing situation in our country is being affected by the geographic shifting taking place, not only in my home state of Florida, but in most of the South and West. How the housing and migration items can be proposed for deletion defies reason.

I would like to speak to the questionable legality of the changes proposed for the Housing Census. Let me emphasize the unambiguous intent of the 1949 Act, which specified a complete Census of Housing for 1950 and decennially thereafter. The proposal of the Office of Management and Budget to move virtually all housing items that are not deleted to the sample questionnaire abrogates the 1949 law. We are not talking about deleting one or two items, under the assumed relevance of the Paperwork Reduction Act, or the shifting of a few items from the 100 percent form to the sample questionnaire. We are talking, in the housing area, of blatantly contravening the explicit intent of the 1949 law. The 1949 act called for a full decennial census and only Congress, not OMB, has the authority to change that.

This brings me to my second point. Virtually all of the census items proposed for deletion or relegation to only the sample long form are essential for the smoother and more effective operation of the Executive and Legislative Branches of government. Federal agencies use these housing and transportation data, and data on related subjects, to allocate funds, evaluate Federal programs, assess the needs of special subpopulations (e.g., the aged, minorities, and so on), administer particular laws, and select samples for special surveys. For example, the housing census data (at risk) are necessary ingredients to the formulas for allocating Community Development Block Grants, Action grants, and low-income assistance programs. The Department of Housing and Community Development uses these data to determine the bases for allocating low-income housing assistance funds and subsidies, and for rental rehabilitation grants. These same data are used to evaluate Federal housing programs.

The housing data at risk are used by the Administration on Aging to plan and evaluate programs covered under the Older Americans Act relating to home repair and weatherization. Home heating equipment data are used to monitor home energy expenditures and consumption patterns as part of the Department of Health and Human Services' energy assistance program.

The third point, Mr. Chairman, is one on which this very Committee has recently focused its attention, holding hearings and issuing extensive reports: the lack of sufficiently detailed economic information, nationally and by geographic area. The OMB proposal suggests deleting mainly economic data -- housing, transportation, employment data -- again, inconsistent with expressed Congressional concerns.

The decennial census is a once-in-a-decade effort to provide benchmark information that will enhance the ability of Congressional Oversight Committees and every level of government -- Federal, State and local -- to identify needs, characterize deficiencies and interrelate at the national, regional, State, county and Congressional district level population, housing and household economic patterns (for example, the living arrangements of the elderly, the poor, the minorities). This is information that is not available in such quantity and with such quality from any other reliable source at any other time.

To make the proposed changes breaks continuity, and reduces the ability to compare and contrast patterns over time. A gap would be created that could not be filled, and that gap would impede our ability to assess progress, stability or decline.

In summary, Mr. Chairman, the proposed deletions and changes clearly are not in harmony with the expressed intent of Congress, and are not in harmony with the needs of every level of government -- Federal, State and local. They are not in harmony with the needs of both the Executive and Legislative branches of the Federal government for data of sufficient detail, collected at least once every ten years, to provided an adequate basis for characterizing many of this country's basic social patterns and trends. To short-change the nation on essential economic data at this critical juncture seems at best injudicious, and at worst, foolish. Thank you.

Senator **Sarbanes**. Now before we turn to Ms. Gramm, do my colleagues have comments or statements they wish to make?

Congressman McMillan.

OPENING STATEMENT OF REPRESENTATIVE McMILLAN

Representative **McMillan**. Well, Mr. Chairman, I would simply like to welcome Ms. Gramm, and I think all of us share in the concern that the census continue to provide a reasonable and accurate as possible statistical base for the many activities that the Congress and others depend upon it for.

I think we're all aware of the, perhaps some, constraints that were imposed upon us by the Paperwork Reduction Act of 1977, which I presume is the basis for the analysis of what we are undertaking in terms of what should or should not be included in the 1990 census. So I will look forward to your testimony and that of others with respect to shedding light on this question.

I would raise the question also as to whether or not we will at sometime have an opportunity to hear the Bureau of Census address the question as well. I don't believe they are scheduled to appear before us this morning. But nevertheless, I hope to learn more about what's at issue here this morning and would like, Mr. Chairman, unanimous consent to insert the written opening statements in the record by Senator D'Amato and Congressman Wylie.

Senator **Sarbanes**. Without objection, those written opening statements will be included in the record.

Representative **McMillan**. I yield back the balance of my time. Thank you.

[The written opening statements of Senator D'Amato and Representative Wylie follow:]

WRITTEN OPENING STATEMENT OF SENATOR D'AMATO

MR. CHAIRMAN, I WANT TO WELCOME TO THE JOINT ECONOMIC COMMITTEE THIS MORNING OUR DISTINGUISHED WITNESS, WENDY GRAMM, AND THE VARIOUS MEMBERS OF THE PANEL WHO WILL BE DISCUSSING OMB'S OVERSIGHT OF THE 1990 CENSUS.

THE UNITED STATES CENSUS, A PROCEDURE THAT AMERICANS HAVE BEEN A PART OF EVERY DECADE SINCE 1790, IS VITAL IN DETERMINING THE DEMOGRAPHICS OF OUR COUNTRY. NOT ONLY IS THERE A CENSUS FOR DETERMINING THE U.S. POPULATION, THERE ARE ALSO SEPARATE CENSUSES FOR AGRICULTURE, GOVERNMENT, BUSINESS, MANUFACTURERS, TRANSPORTATION, MINERAL INDUSTRIES, AND CONSTRUCTION. THE INFORMATION GATHERED BY THESE CENSUSES IS USED BY LOCAL AND STATE GOVERNMENTS, BUSINESSES AND SOCIAL SCIENTISTS, TO NAME A FEW. RECOGNIZING THE IMPORTANCE OF THE DATA GATHERED BY THE CENSUS, THE GOVERNMENT MUST PROVIDE THE RESOURCES THAT ARE ESSENTIAL IN UNDERTAKING THIS ENORMOUS TASK.

IN THE ERA OF GRAMM-RUDMAN, IT IS IMPERATIVE THAT AGENCIES WITHIN THE GOVERNMENT MAKE ALL NECESSARY EFFORTS TO

KEEP THEIR COSTS TO A MINIMUM. RESOURCEFULNESS HAS BECOME AN IMPORTANT WORD TO THOSE IN FINANCIAL PLANNING POSITIONS IN ORGANIZATIONS THAT ARE RECIPIENTS OF FEDERAL FUNDS. CAREFUL PLANNING AND COST-CUTTING MEASURES HAVE BECOME INGRAINED IN THE MINDS OF BUDGETARY PLANNERS. NO AGENCY IS EXEMPT FROM THIS PROCEDURE, NOT EVEN ONE THAT PERFORMS THE NECESSARY AND VITAL FUNCTIONS OF TAKING THE CENSUS OF THE UNITED STATES.

IN EVERY BUDGET, THERE IS ALWAYS FAT TO BE CUT. ADVICE FROM AN OUTSIDE SOURCE CAN BE VERY HELPFUL IN DETERMINING WAYS TO CUT OUT WASTEFUL ASPECTS OF A BUDGET. OMB INTERVENTION CAN SERVE A USEFUL PURPOSE IN AIDING THE CENSUS BUREAU IN DESIGNING A MORE RESOURCEFUL CENSUS PROGRAM.

I LOOK FORWARD TO THE TESTIMONY OF OUR WITNESSES THIS MORNING AND THEIR IDEAS ON OMB OVERSIGHT INTO THE 1990 CENSUS. THEIR EXPERTISE IN THIS AREA WILL HELP THE COMMITTEE TO BETTER UNDERSTAND THE PROCEDURES REGARDING OMB OVERSIGHT AND THE NECESSARY PREPARATION IN CONDUCTING A CENSUS.

THANK YOU, MR. CHAIRMAN.

WRITTEN OPENING STATEMENT OF REPRESENTATIVE WYLIE

I WELCOME DR. GRAMM AND THE PANEL OF WITNESSES TO THIS MORNING'S HEARING.

FEW PEOPLE IN ATTENDANCE WILL ARGUE THE IMPORTANCE OF THE U.S. CENSUS. IT MAY BE THE SINGLE MOST IMPORTANT DATA COLLECTION EFFORT ONDUCTED BY THE FEDERAL GOVERNMENT AND USED BY PEOPLE ALL OVER THE WORLD.

ALL NINETY-SIX MILLION HOUSEHOLDS ARE POLLED IN THIS ACTIVITY. ONE IN SIX HOUSEHOLDS IS ASKED -- OR REQUIRED TO PUT IT BLUNTLY -- TO FILL OUT AN EXHAUSTIVE, TIME CONSUMING QUESTIONNAIRE. IF YOU'VE EVER FILLED IT OUT, THEN YOU KNOW WHAT I MEAN. THE CENSUS BUREAU SAYS IT TAKES 45 MINUTES TO FILL OUT. I WOULD SUGGEST IT TAKES AN HOUR OR MORE -- IF YOU HAVE THE PATIENCE TO DO IT RIGHT.

JUST THINK OF THE COUNTLESS MILLIONS OF HOURS DEVOTED TO THIS EFFORT. DON'T YOU THINK THAT WE MEMBERS OF CONGRESS HAVE THE RESPONSIBILITY AND OBLIGATION TO ENSURE THAT WE MINIMIZE THIS BURDEN ON THE PUBLIC?

THAT'S THE LOGIC BEHIND THE PAPERWORK REDUCTION ACT WHICH WAS ENACTED WITH OVERWHELMING CONGRESSIONAL APPROVAL AND EVEN MADE STRICTER LAST YEAR. I THINK IT IS APPROPRIATE THAT THE FEDERAL GOVERNMENT TAKE EVERY STEP TO MINIMIZE THE BURDEN ON THE PUBLIC AND TO ENSURE THAT THERE IS JUSTIFIABLE MERIT FOR THAT BURDEN AS WELL. COME TO THINK ABOUT IT, IT'S NOT UNLIKE THE ISSUE OF TAXATION.

SO HERE WE ARE TODAY MEETING WITH THE OFFICE OF MANAGEMENT AND BUDGET -- THE AGENCY EMPOWERED BY CONGRESS TO COMPLY WITH OUR PAPERWORK REDUCTION ACT. I TRUST, MR. CHAIRMAN, THAT WE WILL HAVE THE OPPORTUNITY DURING A FUTURE HEARING TO LEARN THE PERSPECTIVE OF THE CENSUS BUREAU.

THANK YOU.

Senator SARBANES. Senator Melcher.

OPENING STATEMENT OF SENATOR MELCHER

Senator MELCHER. Thank you, Mr. Chairman.

I think it is fair to say that while most of us in America sometimes get tired of surveys, one survey that we do respect and recognize its need is the Census Bureau data that is collected from each household every 10 years. I find it amazing that there are recommendations that would—in this preliminary trial or dress rehearsal proposal that would drop out the questions on energy and transportation and drop out a lot of questions on housing, all of which affects what we are doing here in Congress and affects every State legislature, reaches down to every county level across the country and would propose that we don't need the information that the data collected is not essential and that it's too much every 10 years to look at this data.

Well, that is simply not the case. The data, it's collected, it provides the type of information that we lock into various forms of legislation at our level here in Congress on the national level, which then flows down to the State level, which then flows down to the county level, which then flows down to the people.

I'm interested, Mr. Chairman, in the hearing. I am sorry that I will have to go, but I will carefully review the record on this, because I think we are setting the stage for lack of information for the next decade, the last decade of this century, that will be a very strange type of operation for us to reflect in the coming years in legislation and how we address it.

Thank you very much, Mr. Chairman.

Senator SARBANES. Thank you, Senator Melcher.

Congressman Scheuer.

OPENING STATEMENT OF REPRESENTATIVE SCHEUER

Representative SCHEUER. Thank you, Mr. Chairman.

Mr. Chairman, when this announcement was first made by OMB in the Washington Post on Thursday, July 30, it was stated by OMB, as a justification for the fact that they were planning to deny this knowledge to all parts of the American public, that there were four justifications for this. The first was that much of the information was available elsewhere. Second, that the information wasn't specifically required by statute. Third, that it was of use only in certain parts of the country, and fourth, that the information didn't serve policymaking purposes.

Mr. Chairman, it seems to me astonishing that the OMB would say that the census can't develop information that might be available elsewhere.

We are not, each of us, Libraries of Congress or Congressional Research Services, and one of the important things that the Bureau of the Census does is to collate information and make it available in thoughtful form for people who don't have that capability themselves. None of us do.

Second, that it wasn't specifically required by statute. I never knew that the Census Bureau was limited in the information they would give us by what we required them to produce by statute. That would be a sad day, indeed, if they adopt that policy.

Third, they say if the information would be of use in only some parts of the country, they won't apply it. Well, my goodness, mayors and Governors all deal with problems that are specific to their parts of the country. We, as members of the House and Senate do it every day. We are a very variegated, pluralistic society with all kinds of local and regional unique problems and unique circumstances, and we have to know about them.

Fourth, this information that they are now proposing to deny us doesn't serve policymaking purposes. Well, it's perfectly evident from the array of people up here at the national level and from the witnesses that we are going to hear from both the public and the private sector, that this information that they now propose to deny us is essential for public policymaking purposes, in the field of transportation, in the field of education, in the field of employment policy, in the field of rationally looking at our public trends, movements, births, deaths, and so forth.

I can only take one small ray of comfort from this announcement, and that is the administration appears to want to deal equitably and equally with the imposition of ignorance and with the denial of knowledge. When I read last Friday that they wanted to deny knowledge about options and choices to 13- and 14-year-old out-of-wedlock pregnant girls, it seemed to me that this implied a bias against the poor and the ignorant. Now we see that that's not true. The same imposition of ignorance is to be applied to corporate executives, to mayors, Governors, Senators and Congressmen.

There may be some small degree of comfort in that, Mr. Chairman. [Laughter.]

Senator **SARBANES**. Congressman Hawkins.

Representative **HAWKINS**. Oh, I'd rather have the agency state its case, Mr. Chairman, before responding to it. Perhaps they have awakened to the idiotic approach that they have been portrayed as pursuing in the newspapers. I'd like to hear the case, and then I think we can respond. Thank you.

Senator **SARBANES**. Senator Bingaman.

Senator **BINGAMAN**. I have no statement, Mr. Chairman. I'm looking forward to the testimony.

Senator **SARBANES**. As I indicated earlier, we're very pleased to have with us as a guest of the committee, Congressman Dymally, the chairman of the Subcommittee in the House of Representatives on Census and Population.

Congressman Dymally.

OPENING STATEMENT OF REPRESENTATIVE DYMALLY

Representative **DYMALLY**. Thank you very much, Mr. Chairman. I greatly appreciate the opportunity to join your committee for this oversight hearing on proposed reduction in the questionnaires in the 1988 census dress rehearsal.

As chairman of the House Subcommittee on Census and Population, I have been deeply involved in plans and activities for the 1990 decennial census. The interest of the Joint Economic Committee in this critical undertaking is welcomed, and will be, I believe, beneficial to Congress, the Census Bureau, and the public and, hopefully, OMB.

Mr. Chairman, in the interest of time, let me be brief and to the point about my thoughts on today's hearing.

With your permission, I would like to submit my written opening statement for the record.

Senator **Sarbanes**. Your written opening statement will be included in the record.

Representative **Dymally**. Thank you, Mr. Chairman.

In May of this year, we held a joint House-Senate hearing to review the Census Bureau's submission to Congress on the content of the 1990 questionnaries.

We heard testimony from the Census Bureau on the lengthy process to determine which questions must be asked in the 1990 census. We heard from the Office of Management and Budget as to the role OMB plays in developing the questionnaire content.

The Department of Housing and Urban Development was invited to testify, given the important housing component of the census. The Secretary was in Moscow. No one else was selected to represent the agency, and they have never since contacted the subcommittee.

It has been less than 3 months since our oversight hearing. Congress is about to adjourn in the next day or so for 4 weeks. And I received a copy of the 1988 dress rehearsal forms with literally whole pages worth of questions crossed off with a big X.

At our previous hearing, I asked some questions about the burden on the public presented by the census questionnaires, but Mr. Chairman, OMB's approach to the dress rehearsal question seems to me to be very questionable at best, and I think specific questions concerning process need to be asked and answered today.

For example, if OMB was so concerned about the Paperwork Reduction Act, why did it not set limitations while the questionnaires were being developed instead of after they were completed? OMB headed up the Interagency Task Force while the questionnaires were being developed. Why didn't OMB question the justification for questions within the framework of this task force and express any remaining concerns about the need for certain items on our May 14 hearing? Where was the Department of Housing and Urban Development? Does the Department feel that the data collected is not necessary to the administration of housing programs, and why have they not been courteous enough to respond to the committee's concern?

Mr. Chairman, these are critical questions, and I look forward to setting the record straight today after hearing from Ms. Gramm.

Senator **Sarbanes**. Thank you.

Representative **Dymally**. But let me say this, Mr. Chairman, in conclusion. I am very troubled by what is happening here. This effort here on the part of OMB will scuttle the dress rehearsal. If the dress rehearsal is scuttled, these questions will not be in the 1990 form. We will have a politically, ideologically motivated census, and I am further troubled that when these questionnaires were crossed out and sent to the Census Bureau, they were opposed to the elimination. In yesterday's meeting, they were muted, and I want Ms. Gramm to tell me who made the phone call to the Census Bureau to tell them to shut up.

Senator **Sarbanes**. Thank you, Congressman Dymally.

[The written opening statement of Representative Dymally follows:]

WRITTEN OPENING STATEMENT OF REPRESENTATIVE DYMALLY

Mr. Chairman, I greatly appreciate the opportunity to join your committee for this oversight hearing on proposed reductions in the questionnaires for the 1988 Census Dress Rehearsal.

As Chairman of the House Subcommittee on Census and Population, I have been deeply involved in plans and activities for the 1990 decennial census. The interest of the Joint Economic Committee in this critical undertaking is welcomed, and will be, I believe, beneficial to Congress, the Census Bureau, and the public.

Mr. Chairman, in the interest of time, let me be brief and to the point about my thoughts on today's hearing.

On May 14, a joint House-Senate hearing was held, to review the Census Bureau's submission to Congress on the subject matters to be covered in the 1990 census.

The Census Bureau's testimony revealed a lengthy process -- involving federal agencies, State and local governments, and private sector data users -- through which determinations were made as to what questions must be asked in the 1990 census.

Ms. Wendy Gramm, Office of Management and Budget, also testified at this hearing. Ms. Gramm gave an informational statement as to the role of O.M.B. in developing the questionnaire content, but expressed no opinions on any particular subject matters proposed by the Census Bureau.

The Department of Housing and Urban Development was invited to testify, given the important housing component of the census. The Secretary was in Moscow; no one else was selected to represent the agency.

It has been less than three months since our oversight hearing.

Congress is about to adjourn for four weeks. And I receive a copy of the 1988 Dress Rehearsal forms, with literally whole pages worth of questions crossed off with a big "X".

At our previous hearing, I expressed some concerns about the burden on the public presented by the census questionnaires. I stated that we must ensure that each question will yield accurate data which is needed for legitimate purposes of public policy and planning. I urged the Bureau and O.M.B. to consider whether alternative sources existed for any of the data collected during the decennial census.

But, Mr. Chairman, O.M.B.'s approach to the Dress Rehearsal questionnaire seems to me to be irresponsible, at best. And I think specific questions concerning this process need to be asked and answered today. For example:

1. If O.M.B. was so concerned about the Paperwork Reduction Act, why didn't it set limitations while the questionnaires were being developed, instead of after they were completed?

2. O.M.B. headed up the interagency task force while the questionnaires were being developed. Why didn't O.M.B. question the justification for questions within the framework of this task force, and express any remaining concerns about the need for certain items at our May 14th hearing?

3. Where has the Department of Housing and Urban Development been all of this time? From what I have heard over the past week, some of the questions O.M.B. proposes to delete are crucial to the administsration of federal housing programs? Is H.U.D. telling us that it doesn't need this data because it has no intention of fully administering these programs?

Mr. Chairman, these are critical questions, and I look forward to setting the record straight today.

Senator Sarbanes. Ms. Gramm, we are prepared to hear from you.

STATEMENT OF WENDY LEE GRAMM, ADMINISTRATOR, OFFICE OF INFORMATION AND REGULATORY AFFAIRS, OFFICE OF MANAGEMENT AND BUDGET, EXECUTIVE OFFICE OF THE PRESIDENT

Ms. Gramm. Mr. Chairman, I am delighted to be here. [Laughter.]

Very frankly, I am surprised, I am rather shocked, at the statements that have been made about factual questions. I would like to be able to set the record straight as to exactly what is happening at this point in time, and I would be happy to answer your questions.

I have a prepared statement that I will submit for the record, but I would like to summarize some of the important points and answer questions you raised in your opening statement.

I would like to give a little background.

Let me just jump the gun a little bit and state the punch line first: OMB has not yet made any proposal or any decision as to the content of the census or any proposal for deletion of questions from the census. It is wrong to suggest that OMB has proposed cutting the census. That is just flat wrong. To suggest that we have given the Bureau of the Census or anybody else only 2 weeks to reply is also incorrect.

But let me go back and give a little background and tell you where we are in the process. This process here was envisioned under the Paperwork Reduction Act and is important.

I also welcome your comments, as well as comments that this hearing might generate from the public, on the burden as well as the uses of the individual questions proposed for the census dress rehearsal.

First of all, under the Paperwork Reduction Act of 1980, we, in OMB, have a role to play, as does the public and the agencies, whenever they ask for information from the public. One of OMB's functions under the Paperwork Reduction Act is to review information collections by the Federal Government to ensure that data have the greatest possible usefulness to the Government and to the public and that the burden is held to the minimum practicable.

Since the Paperwork Reduction Act was enacted—from the beginning of 1981 through 1986—OMB has reviewed some 22,000 information collections or, on average, over 3,500 per year. Before the Paperwork Reduction Act, we also reviewed forms under the authority of the Federal Reports Act of 1942. The forms review process is not a new one. Obviously, the purpose of review and purpose of the Paperwork Reduction Act is to ensure that information collected has practical utility and that the agencies collect necessary information with the minimum burden that is appropriate and practicable.

By practical utility we mean that the data collected are actually useful to the agency and to the public, taking into account their accuracy, adequacy, and reliability, and the agency's ability to process the information in a useful and timely fashion.

This is not new. It is required by the Paperwork Reduction Act, and there has been a review process like this since 1942.

I also share your concerns——

Representative DYMALLY. Mr. Chairman, may I interrupt Ms. Gramm just for one moment?

The Paperwork Reduction Act—the Census Bureau law, and statute precludes such exemption, so it doesn't apply, and I think what you are saying is irrelevant.

Ms. GRAMM. No. The Paperwork Reduction Act——

Senator SARBANES. Congressman, Dymally, I think we probably ought to let Ms. Gramm make her statement, even though, as it is made, we may react very strongly, either there may be inaccuracies or we may disagree with the logic of it. I've already had that reaction already, a couple of times [laughing], but I think we had better let Ms. Gramm finish, and then we'll have an opportunity——

Ms. GRAMM. I, too, have had those reactions [laughter].

Senator SARBANES. And the full statement has been included in the record, and I don't anticipate that Ms. Gramm——

Ms. GRAMM. I'll keep it short.

Senator SARBANES [continuing]. Is going to go on at great length——

Ms. GRAMM. That's right.

Senator SARBANES [continuing]. And then we'll have an opportunity to do the questions.

Representative SCHEUER. Ms. Gramm, would you be kind enough to pull the mike a little closer to you, so I can react strongly, too.

Ms. GRAMM. Okay. [Laughter.]

Let me also point out that I share your concern about the quality of Federal statistics, and that data produced by the Federal Government need to be timely and comprehensive, as you said.

Our other responsibilities under the Paperwork Reduction Act, as you well know, are to ensure that agencies collect and use data in accordance with the Privacy Act and other laws related to confidentality, and to maintain and improve the quality of statistics. The latter is our statistical policy function.

Now the Paperwork Reduction Act specifies a role for OMB, the public and the agencies during the information collection review process.

First of all, the agencies that propose the information collection—in this case, the Census Bureau—must submit the proposal to OMB for review, and they must notify the public, in the Federal Register, at the time that they send the submission over to OMB for review. The Paperwork Reduction Act specifies that we open a public docket, a record for each information collection, and hold that record open—up to 90 days, if necessary—to allow the public to comment on the practical utility, the burden on respondents who have to fill out the form, and agency's justification of the need for the data, and to put forth any other views they might have on the form.

The public's role is to comment during the reivew period.

The 1986 amendments to the Paperwork Reduction Act strengthen the role of the public in the information collection review process. They specify that agencies are to provide such information in the Federal Register as an estimate of the burden hours, or the time it would take, respondents to fill out the form. The amendments also suggest that the agencies provide other information that would allow the public to make more meaningful comments on particular forms.

Agencies are then required to provide a justification, to OMB, of the need for the information that's to be collected and must demonstrate the practical utility of that information. They must also show that it's not duplicative—that the data are not available from other Federal forms or other sources, and that it is collected in a way that would minimize the burden on the respondents.

This requirement that agencies justify what's being collected and also the important role of the public in commenting on Federal forms were not only part of the Paperwork Reduction Act in 1980 but, also were strengthened in the 1986 amendments.

OMB's role in the process is to review the proposed information collection—to review it on the basis of the criteria laid out under the Paperwork Reduction Act and to review the public record and comments. Based on the information in the public record, and based on the criteria laid out in the Paperwork Reduction Act, we then must approve or disapprove the form.

The public comment period for the 1990 census dress rehearsal started on June 17 and goes through September 15. We have notified the Census Bureau that we would like to take the full 90 days, because the census is an important survey and because it would go to all households—the short form would go to all households, about 96 million households. The longer form, which the Census Bureau proposed to be a one-in-six sample, will go to some 16 million households. So you are talking about a large burden, about 30 million hours, I believe, is the Census Bureau's estimate of the burden on the public. Because of the importance of the census, we are taking, instead of the normal 60-day comment period, the full 90-day period allowed by law, to allow the public ample time to comment.

That period—the 90 days—runs out on September 15. Needless to say, if something were to come a day late, a few days late, those public comments wouldn't just be cut out of the docket.

Our decision must be based on the record in the docket. We are right now, in terms of process, in the middle of the paperwork review and public comment period, which started on June 17.

I might add, this is the first time we have reviewed the complete 1990 census form, for the simple reason that the dress rehearsal represents the first time the form has been presented to us in its entirety.

Over the past 2 years, as the Chair of the Federal Agency Council for the 1990 Census, as I mentioned in my May testimony, we have chaired a group of Federal agency users of census data. The principal purpose of that committee was to evaluate questions for the national content test—to identify and coordinate all the potential Federal agency users of the data and their needs for the data. Obviously, the census is a method by which agencies who want to obtain data can obtain them. And since the census is a free way for the agencies to obtain data, they have many demands, many wishes. They would like to collect a lot of data. And that is recognized.

The census is one information collection where an agency that wants to use the data, such as HUD or the Department of Transportation, doesn't pay for the data. It asks the Census Bureau to include questions on the form and the Census Bureau pays, out of its budget, for conducting the census. This census is going to cost some $2.6 billion, but even so, there are a lot of competing demands for the limited amount of space available on the census forms.

And the Census Bureau, itself, has—throughout the process—stressed the notion of not going above the amount of burden that was in the last census, at least as a benchmark, an upper limit.

But the whole purpose of the Federal Agency Council was to advise OMB on the requirements of the executive departments and agencies for the data and to coordinate their priorities. Their major focus though was to look over and discuss the question and different forms of questions, how you might ask for information using different formulations of the same question in the national content test. We approved a number of forms for the national content test, where some seven different forms explored different ways of asking various questions.

As I stated in my May 14 testimony before the Senate Subcommittee on Federal Services, Post Office and Civil Service, and the House Subcommittee on the Census and Population, we had not at that time done a Paperwork Reduction Act review of any proposed 1990 census form, because we had not yet received the dress rehearsal forms. We received the dress rehearsal proposal, which included the dress rehearsal forms, on June 17 when the Census Bureau sent it over to us.

That is what we are discussing now. We are in the middle of our paperwork review of this particular proposal.

I might add that what we have been doing in the Federal Agency Council is looking at individual agencies' questions, and the agencies at that time were also being asked about their need for data—what was required; to what extent was it required for the whole, 100 percent population versus the one in six sample; to what extent would a smaller sample do?

Bear in mind that the census is only one way in which we collect data in the Federal Government. We clear some 3,500 information collections per year. Not all of them are statistical surveys, but many of them are.

So we are right now in the middle of a process that started June 17 and will end on September 15.

Now let me talk about the July 24 meeting. Remember what OMB's role is. We have a docket. At the end of the period we review the public comments, we review the information collection for the criteria laid out on the Paperwork Reduction Act; and then we make a decision. We approve or disapprove the form.

One of the concerns that we had, and the reason we talked to the Census Bureau and raised questions, was that the Census Bureau had not provided enough—even a minimum—justification of the need for some particular questions. So we went back to ask them for it—to tell them to make sure that they justified their need for particular questions, because that justification needs to go into the docket upon which we must base our decision.

So there is a certain amount of information that the public should have, and that we need to have. Even though we in OMB might have other independent information about the need for the data, it still has to be supported in the docket, and the agency that is proposing the information collection has the responsibility to explain why a particular data element is needed for the proper performance of the agency function.

In the case of the census, of course, since the Census Bureau is asking questions for other agencies, such as the Department of Transportation or HUD, it surely can get help from these other agencies in justifying the need for that information.

So those are some of the issues that we raised in staff-to-staff discussions. We raised some other questions as well, concerning burden and the quality of data, as well as justification in the paperwork record.

These were staff-to-staff discussions. OMB had made no proposal, because we don't do this in the review process. We don't make proposals in some kind of a negotiation process. We could have just said at the beginning, it's not properly justified, and sent it back and said, rejustify it, but in the interest of expediting the process, to raise some questions that we thought the Census Bureau needed to be able to answer, and to ensure that the required information would get into the docket upon which we must, by law, base our decision, we met with the Census Bureau to raise some of these questions.

Now, to reiterate. There was no OMB position. I don't know where you got this form with scratched-out questions, but we have not yet made a proposal, because, and let me stress again, the public hasn't had a chance to comment. It's premature for us to have conclusions before we have looked at all at what the public has to say, or what other agencies want to say about the need for the questions.

Now some of the questions that we raised relate not only to the burden issue but to the quality of statistics as well. For example, is it really necessary to ask all 17 short-form questions of 100 percent of households? Is it imperative that we know that from the 100 percent sample whether or not a house has a telephone, or is that something that we might be able to get out of a sample?

Another question on the short form is the telephone number. Now if the telephone number is needed for followup information, does it need to be on the census questionnaire itself, where, if you don't provide an answer, you can be subject to a fine. This is a mandatory questionnaire, bear in mind.

If it is needed for Census Bureau followup, might it not make better sense, maybe, to ask for a telephone number on the back of the form where you are asked to print your name and address. You could say that, for followup reasons, you would also like a telephone number.

Those are questions that we raised. That is not to say that we think they necessarily ought to be done. Bear in mind, we're raising questions now because we think, while it's still early in the process, these are things that the Census Bureau might want to think about, look at, and see whether or not they can provide answers for.

Remember, we have to be concerned about the fact that if you make a form very burdensome, you also reduce the accuracy of some of the responses.

The other kind of question we raised was whether or not it is necessary to have all long form questions asked of 16 million households. Those of you who might have dealt with data know something about sampling techniques. The question is, could it have been done with a smaller sample? Would a 1-in-12 sample do? Or a more narrowly targeted sample. The question of whether or not you use a public sewer or a septic tank, for example. Is that something that is necessary to ask every sixth household, or will a smaller sample do? Or maybe even a smaller sample size targeted at rural areas, if the ultimate agency and public use of that information is to help rural planners, for example. I'm not sure.

But those were the types of questions that were raised.

Let me just make one important point and that is, as I said, as the form gets longer, for some of these questions, there's a real accuracy concern. For example, there are questions where they ask you about your utility bills, how much you pay for various utilities and fuels over the year. There are seven questions on energy use.

I have an interesting note about some energy statistics. The Energy Information Administration obviously is interested in fuel use data. EIA wanted to get information like that, but, in their own statistical programs, they have not used questions like this, because they found that in early censuses, those questions gave error rates of some 25 to 50 percent. That is, as you are sitting there filling out the form, and you are asked, "How much did you pay last year for hazard and flood insurance? How much did you pay in real estate taxes? How much of your rent was such and so? How much electricity? How much were your utility bills? You can either go back to all your records and go through and figure out exactly how much you paid, or you can guesstimate.

EIA found that the best way to get real accurate information—and what they did—was get the permission of a randomly selected sample of households to go to their energy companies and get their billing information. The people gave that permission, and EIA got much more accurate data. EIA now says that they need only one energy question, not all seven, on the census, this one to use as a benchmark.

So that's the kind of questions that we're raising. And we're raising them not because we've made any decisions yet, but we're just asking the question, asking for justification to make sure that the record is sufficient when we have to make our decision. We're still in the process. We welcome public comment, not only on the uses that they find for the data—because, don't forget, to the user, census data are free—except it does cost $2.6 billion to collect it—but also we want to make sure that the data are accurate as well. And that the burden on the public who's responding is not going to be so great as to deter response, because the census is very important. And we want to make sure that the questions aren't going to be overly intrusive and therefore reduce the accuracy of any response. People might just say, well, I'm just going to guess on how much I paid on insurance rather than be accurate.

Maybe there are other ways to get needed data. On the value of their home, for example, do we have to ask that of every single household in the country? Might a statistically sound, very good sample do or are there real justifications for a 100-percent count?

So that is where we are in the process now. The whole purpose of the Paperwork Reduction Act is to get response on all of these questions, and I hope that you will solicit, not only response from those researchers and others who might want to use the data for research purposes, but also from those that might have some concerns about burden and intrusiveness as well, because it is a burden. In the oversight hearings at which I testified in May, I heard comments from people that as Members of Congress, they got more comments, negative comments, on the 1980 census than on any other particular issue. But again, we look forward to hearing what the public has to say and what the agencies have to say, as well, about the uses and the burdens of the data collection.

That is where we are. We haven't made a proposal yet.

Senator SARBANES. Thank you, Ms. Gramm.

[The prepared statement of Ms. Gramm follows:]

PREPARED STATEMENT OF WENDY LEE GRAMM

Mr. Chairman and members of the Joint Economic Committee: I am happy to be here today to discuss the Office of Management and Budget's review of the "Dress Rehearsal" for the 1990 Census of Population and Housing.

In the Federal Reports Act of 1942, which was succeeded by the Paperwork Reduction Act of 1980, the Congress established a process--involving Federal agencies, the Office of Management and Budget (OMB), and the public--for reviewing information collections by the Federal Government, to assure that the information collected and published is of the greatest possible usefulness to the government and the public and that the burden on those asked to provide the information is held to the minimum level practicable and appropriate.

OMB is currently following this long-established, statutorily-required process in reviewing the Dress Rehearsal for the 1990 Census, a prototype of the questionnaires and design that the Bureau of the Census is proposing to use in the 1990 Census. This census is an expensive information collection. It is now estimated that it will cost the Federal Government $2.6 billion. Assuming that the time the public spends completing census forms has an average value of $15 an hour and that the currently-proposed questionnaires and sample design are used, the total cost to the public in time and effort, based on the Bureau of the Census's burden estimates, will be about $450 million.

In view of the cost of the census and its importance as a source of statistical data for apportionment of the House of Representatives, redistricting of State legislatures, and measuring trends and changes in the demographic makeup and living standards of the population, all Americans have an interest in assuring that the 1990 Census produces accurate, reliable, useful information. In view of OMB's long-standing statutory responsibilities not only for reviewing Federal information collections, but also for maintaining and improving the quality of Federal statistics, it should come as no suprise to anyone that OMB is giving tne 1990 Census questionnaires and design the most thorough and careful review possible.

In my testimony, I should like first to describe the information collection review process and the roles that OMB, Federal agencies, and the public play in the process. I will then discuss the status and schedule of our review of the 1990 Census Dress Rehearsal.

The Paperwork Reduction Act and the Paperwork Review Process

The Paperwork Reduction Act of 1980 represents an ambitious attempt by the Congress to rationalize the Federal Government's collection and use of information. Among the purposes of the Act are:

> To minimize the Federal paperwork burden for individuals, small businesses, State and local governments, and other persons;
>
> To minimize the cost to the Federal Government of collecting, maintaining, using, and disseminating information; and
>
> To maximize the usefulness of information collected, maintained, and disseminated by the Federal Government.

The unifying theme of the Paperwork Reduction Act is that information is a scarce economic good that, like other economic goods, has costs of production as well as benefits of use. Under the Act, the Administrator of the Office of Information and Regulatory Affairs (OIRA) within the Office of Management and Budget (OMB) is responsible for assuring that the benefits of collecting, processing, and disseminating data outweigh the costs.

Under the Paperwork Reduction Act, Federal agencies that propose to collect information are required to submit their proposals to OMB for review and to demonstrate to OMB and the public that the need for each question is justified in light of the costs involved. OMB is required to review and either approve or disapprove each proposal based on criteria set forth in the Act. Specifically, before approving any collection of information, OMB is required to determine that the information has practical utility and that the collecting agency has reduced "to the extent practicable and appropriate the burden on persons who will provide the information." The practical utility of general-purpose statistics is defined as the actual, not the theoretical or potential, usefulness of information to agencies and the public, taking into account its accuracy, adequacy, and reliability, and the agency's ability to process the information in a useful and timely fashion.

In addition to the review function it assigns to OMB, the Paperwork Reduction Act creates important roles for Federal agencies and the public. Under the Act, agencies have to justify each proposed collection of information in writing, and have their justification publicly available for all to see. The justification must demonstrate that the collection of information is the least burdensome necessary for the proper performance of its functions, that the collection is not duplicative of others, and that the collection has practical utility.

The Paperwork Reduction Act also sets forth various procedures to encourage and facilitate public comment on proposed and existing information collections. Agencies must give notice in the Federal Register that they have submitted proposed information collections to OMB for review, and OMB must give the public meaningful opportunity to comment.

I should like to note that the 1986 Amendments to the Paperwork Reduction Act strengthen the provisions of the Act regarding public participation in the information collection review process. The amendments require that agencies publish certain specific information in the Federal Register about the information collections they are submitting to OMB, including a brief description of the need for the information and its proposed use, and an estimate of the response burden. The purpose of this amendment, which OMB wholeheartedly supports and is carrying out, is to encourage more public comment on all Federal information collections. On July 23, 1987, OMB published in the Federal Register proposed amendments to its paperwork clearance regulation (5 CFR 1320) that, reflecting the 1986 Amendments to the Paperwork Reduction Act, would enable the public to have fuller and more timely information about the Federal information collections that are being reviewed by OMB.

Review of the 1990 Census Dress Rehearsal

OMB is currently reviewing the 1990 Census Dress Rehearsal under the Paperwork Reduction Act. The Dress Rehearsal is exactly what its name implies--a full-scale population and housing census, to be conducted in three selected areas of the country in March 1988, using the questionnaires, data collection methods, and processing techniques that the Bureau of the Census proposes to use in the 1990 Census. On April 1, 1988, the Bureau of the Census is to submit to its authorizing committees in Congress "a report...containing the questions proposed" for inclusion in the 1990 Census.

The Bureau of the Census submitted the Dress Rehearsal to OMB for review on June 17, 1987. Under the Paperwork Reduction Act, OMB has 60 days to complete its information collection reviews and may extend the review period by another 30 days, with notification to the sponsoring agency. We have notified the Bureau of the Census that we intend to take the full 90 days for our review. In view of the importance of the 1990 Census as a source of data for both government and the private sector, and in view of the very large cost and respondent burden involved in the taking of the census, we believe that 90 days are necessary to fulfill our responsibilities under the Paperwork Reduction Act and, furthermore, that the public deserves that opportunity to comment on the forms and plans for the census.

OMB is reviewing the Census Dress Rehearsal in exactly the same manner that it reviews all other proposed information collections. As I indicated earlier in my testimony, OMB has been reviewing Federal information collections since 1942, first under the Federal Reports Act and now under the Paperwork Reduction Act. From the beginning of 1981 to the end of 1986, we reviewed over 22,000 proposed information collections, or 3,500 per year. In all reviews, our first step is to assess the documentation provided by the sponsoring agency, to assure, as required by the Paperwork Reduction Act, that the data to be collected have practical utility and do not duplicate other available data and that respondent burden has been reduced to a minimum practicable level.

OMB has been involved in the process of developing the content of the 1990 Census through the Federal Agency Council for the 1990 Census, which we organized in 1984 and have chaired. As I discussed in my testimony on May 14th at a joint hearing by the Senate Subcommittee on Federal Services, Post Office, and Civil Service and the House Subcommittee on Census and Population, the Federal Agency Council played a large and valuable role in identifying possible census questions that should be tested in the 1986 National Content Test. We have, therefore, been aware of the items that were tested and what the results of the tests were. However, only when the Bureau of the Census submitted the Dress Rehearsal to OMB in mid-June did we have our first opportunity to see the proposed 1990 Census questionnaires and sampling plan packaged in their entirety. The plan the Bureau of the Census submitted to OMB is to administer a "short-form" questionnaire containing 17 questions to all households in the country (about 96 million households). An additional 44 questions, on a "long-form" questionnaire, would be asked of a nationwide sample of 1 in 6, or about 16 million, households.

Our initial review of the questionnaires and documentation left us with a number of questions. Were there suitable alternative sources for some data proposed to be collected in the census? Could more reliable information in some cases be gathered in a smaller-scale survey targeted to specific populations of interest? Is it necessary to sample 16 million households to gather useful data? Might a smaller sample do? Are there cases where nonsampling error might be so large as to negate the value of a large sample? Is enough information on certain subjects being collected in the census to permit meaningful analysis?

On July 24th, OMB staff met with members of the Bureau of the Census staff to convey some of these questions. Let me emphasize that these were staff discussions. No "OMB position" was stated and no decisions were, or have yet been, made. The purpose of the meeting was to raise questions to the Bureau of the Census early in the review process. Specifically, the OMB staff raised the following issues:

> In some cases, data proposed to be collected in the census appear to be available from other sources. (For example, data on residential property values and property taxes paid.) We asked the Bureau of the Census to explain if other sources might be used as an alternative to the census.
>
> In certain cases, there appears to be a significant potential for large response error in census data. (For example, the questions on fuel and utility costs and the value of one's own home.) Before putting such questions on the Census forms, we should be assured that they are likely to yield reliable information and, therefore, meet the practical utility criterion of the Paperwork Reduction Act.
>
> Some items of the proposed Census questionnaires appear to be relevant primarily for a subset of the population, rather than for the population nationwide. (For example, questions about the source of water for one's home and whether one's home is connected to a public sewer or to a septic tank or cesspool. These appear to be questions that are relevant mainly to rural households.) We, therefore, asked whether a large nationwide sample is appropriate for surveying only certain areas of the country. Would other, more carefully targeted surveys than the Decennial Census better accomplish this purpose?
>
> For quite a substantial number of items, we raised questions about the need to collect data from as large a sample of the population as is currently being proposed. For example, do we need to have several of the housing items on the short form--the questionnaire that will go to all households in the country--rather than on the long form that goes to a sample of households? We have also questioned the need for a sample of 16 million households to gather much of the long-form data. The long form imposes a significant burden on the households that are asked to fill it out. As part of its responsibilities under the Paperwork Reduction Act, OMB is obliged to assure that the burden is placed upon no larger a sample of households than is necessary to meet

the accuracy requirements for the major uses of Census data. Also, a very long form may elicit less accurate response than a shorter form.

At the July 24th meeting with the Bureau of the Census staff, OMB staff asked for, and the Census Bureau agreed to provide, additional information to answer these questions. Without adequate justification in the paperwork clearance docket, Census will not have met the minimum statutory requirements of the Paperwork Reduction Act. OMB staff also asked the Bureau to consider alternative sampling strategies that would enable useful data to be gathered with less burden than the currently proposed design and to provide OMB as soon as they are available the Bureau's plans for processing and publishing those items on the census form that require coding. We expect to receive the Bureau's responses to our first two requests in the next several days. It is worthwhile stating that we are still in the middle stages of the paperwork review process. The comment period began June 17th and will continue through September 15th. We expect to complete the review expeditiously.

OMB has received numerous comments by letters and telephone from members of the public and from Federal agencies on the proposed Dress Rehearsal Questionnaire. As I indicated earlier in my testimony, OMB welcomes and encourages public comment on all aspects of the 1990 Census questionnaires, including the time required to complete the short and long forms and the usefulness of the information to be gathered. We will carefully review all comments that reach us before the completion of our review; however, the earlier such comments reach us, the more helpful they will be.

Earlier in my testimony, I mentioned the importance of the Decennial Census as a source of data, as well as its very large cost and burden. The Census is an essential source of data that enable all of us to observe trends over many decades and measure changes between decades in the makeup and living conditions of the American population. Because it is so important, we all wish to see the Census designed and conducted in such a way that it yields the most useful possible information.

However, it is important to recognize that the Census is an expensive effort and that it imposes a significant burden on the American public. The cost of the 1990 Census is currently projected at $2.6 billion. The Bureau of the Census estimates that the average response time for the short form is 15 minutes and for the long form, 45 minutes. With the current proposal to require 1 in 6 households to complete the long form, the total response time required of all American households would be in excess of 30 million hours. Assuming that the time spent in completing census forms has a value of $15 per hour, that is equivalent to over $450 million. To encourage the public to be willing to take the time and make the effort to make the Census a success, the Federal Government must do its part to assure that the burden placed on the public is kept to a minimum.

The cost and burden of the Decennial Census are not easy to control. Unlike most other Federal information collections, which are sponsored and funded by the major users of the information to be collected, the Census is funded entirely in the budget of the Bureau of the Census. For the other Federal agencies that are major users of Census data, and for non-Federal users, these data are essentially free goods. Not surprisingly, the demand for them is very great.

Mr. Chairman, following me today are witnesses who will assert and describe their needs and desires for data from the Decennial Census. Remember that what they argue for will cost them little or nothing. It is our job to assure that these needs justify the costs and burdens imposed by the census, and that alternative, less burdensome or costly data collections do not exist or are not feasible.

Because other incentives to minimize cost and burden are weaker in the case of the Decennial Census than for most other Federal information collections, the paperwork review process is all the more important. In the Paperwork Reduction Act of 1980, Congress established a process that gives the government the means to evaluate and minimize burden and assure that information collected and published by the government will be of maximum usefulness.

Thank you, Mr. Chairman for the opportunity to testify. I welcome any questions your Committee may have.

Senator **Sarbanes**. I think we will take a 10-minute round of questioning. First of all, Ms. Gramm, let me ask you, do you regard the content coverage of the census dress rehearsal as a preview of the questions that will appear in the 1990 census on population and housing?

Ms. **Gramm**. Well, it should be. The dress rehearsal is supposed to be a dress rehearsal for the census, conducted at the same time and with the same procedures.

Senator **Sarbanes**. So the dress rehearsal is a significant event, in terms of what the content of the 1990 census would be; is that correct? That's what it's designed to do; isn't it?

Ms. **Gramm**. Sure. It's designed to be a dress rehearsal.

Senator **Sarbanes**. How long has OMB been considering issues relating to the questions to be included on the 1990 census form?

Ms. **Gramm**. As I said earlier, we have been involved in at least three censuses before this, but with respect to this 1990 census, we established the Federal Agency Council that we chaired in October 1984. November 1984 was the first meeting.

Senator **Sarbanes**. And you chaired the Agency Council?

Ms. **Gramm**. My staff. Maria Gonzalez chaired it.

Senator **Sarbanes**. I mean, a representative of OMB chaired the interagency task force?

Ms. **Gramm**. Yes; the Federal Agency Council. I understand that the Census Bureau had other interagency groups working the census as well.

Senator **Sarbanes**. So for 6 years now—no, for 3 years: 6 years before the census—you've been involved in issues relating to the 1990 census form?

Ms. **Gramm**. Issues relating to Federal user needs for the data, but never really looking at the overall burden, as required under the Paperwork Reduction Act.

Senator **Sarbanes**. How many pretests has the Census Bureau conducted for the 1990 census?

Ms. **Gramm**. Many. I think there were at least seven different forms for some of the content tests.

Senator **Sarbanes**. Did OMB review the questionnaires used for the pretests?

Ms. **Gramm**. We reviewed all questionnaires for the tests; that's right.

Senator **Sarbanes**. For the pretests.

Ms. **Gramm**. For the pretests.

Senator **Sarbanes**. So you've been reviewing the questionnaires used and submitted in the pretests; is that correct?

Ms. **Gramm**. That's right.

Senator **Sarbanes**. When did you start consulting with Federal agencies about the census questions?

Ms. **Gramm**. I would say it was started in 1984 with the Federal Agency Council on the 1990 Census.

Senator **Sarbanes**. So you've been consulting with the Federal agencies about what the questions ought to be since 1984; is that correct?

Ms. **Gramm**. We've been coordinating that process.

Senator **Sarbanes**. Do you draw a distinction between "coordinating" and "consulting" with the agencies about it?

Ms. **Gramm**. No.

Senator **Sarbanes**. All right. Thank you.

Ms. **Gramm**. [Laughing.] I don't think I need to draw such a distinction.

Senator **Sarbanes**. You've also been reviewing the questionnaires that have been used in the pretests; is that correct?

Ms. **Gramm**. Yes. But the purpose of the pretests was quite different than the purpose of the census and also they were for much smaller sample sizes, so the burden wasn't as great.

Senator **Sarbanes**. When did the Census Bureau report the questions it intended to include on the census to Congress?

Ms. **Gramm**. They were required by law to report on April 1, 1987, the content, the kinds of questions they would be asking. And then they will also be reporting April 1, 1988, with the form itself, the actual form of the questions.

Senator **Sarbanes**. Did you review the Census Bureau's report to the Congress about the subjects it intended to include in the census?

Ms. **Gramm**. No; we did not.

Senator **Sarbanes**. OMB did not review that?

Ms. **Gramm**. We did not review that.

Senator **Sarbanes**. Had it been a matter before the interagency group—the Federal Agency Council?

Ms. **Gramm**. No. The Federal Agency Council was established as a committee of users to discuss various questions on content for the content tests. That was their major purpose. They did not review, we did not use them to review, we did not review, the report to Congress on the content. The Census Bureau did not bring it, I guess to the Federal Agency Council.

Senator **Sarbanes**. I'm not quite clear on that response.

Is it your position that the Federal Agency Council had no role in trying to develop the content of the 1990 census?

Ms. **Gramm**. They were there to provide advice on content issues; yes.

Senator **Sarbanes**. So they were there to develop the content—help to develop the content?

Ms. **Gramm**. Help to develop the content by providing input on Federal priorities.

Senator **Sarbanes**. And OMB chaired the Federal Agency Council; is that correct?

Ms. **Gramm**. Yes.

Senator **Sarbanes**. When was the first time that OMB told the Census Bureau that OMB was considering eliminating a large number of the questions which the Census Bureau was developing for——

Ms. **Gramm**. There was no time.

Senator **Sarbanes**. Pardon.

Ms. **Gramm**. We have not done that. So there was no time. That's a null set.

Senator **Sarbanes**. What did you do on July 24?

Ms. **Gramm**. As I explained, we had a meeting——

Senator **Sarbanes**. Were you in that meeting?

Ms. **Gramm**. No; I did not. It was a staff-to-staff discussion. OMB has not yet made decisions, but remember, some of the questions we raised concerned a need for the Census Bureau and the other agencies to make sure, for the record, that they could justify the need for the data, as required by the Paperwork Reduction Act—for that particular record.

So we have not made proposals. We have not suggested that. We have raised some questions.

Senator **Sarbanes**. Is it your testimony that on July 24, 1987, OMB did not indicate to the Census Bureau that it was considering that certain questions should be eliminated from the census form?

Ms. **Gramm**. OMB has not stated to the Census Bureau that OMB is recommending any kind of elimination.

Senator **Sarbanes**. I repeat my question.

Is it your testimony that on July 24, 1987, OMB did not indicate to the Census Bureau that it was raising questions about certain questions in the census form, considering their elimination from the form?

Ms. **Gramm**. Yes. We raised questions.

Senator **Sarbanes**. And the question you raised was the possibility that those particular items should be eliminated from the form; is that correct?

Ms. **Gramm**. No. The questions we raised were, might these questions be done on smaller samples, with smaller census samples, for example. Yes, some questions were raised about whether or not we needed to have, say, questions on the 100 percent form rather than the one in six form, or might sample data be obtained from a smaller sample, or maybe even on a different form.

Senator **Sarbanes**. You didn't raise the possibility of eliminating certain questions altogether from any census form?

Ms. **Gramm**. No; except that the Census Bureau still has to be able to justify that the data have practical utility.

Senator **Sarbanes**. Now, look. You had been involved in a process for 3 years trying the 1990 census——

Ms. **Gramm** These were staff-to-staff discussions, you understand.

Senator **Sarbanes**. Pardon.

Ms. **Gramm**. Yes, the 3 years of discussions were——

Senator **Sarbanes**. That's right, and you were——

Ms. **Gramm**. Those were to develop information and questions for the national content test. And as I stated in my testimony in May, and as I stated here today, we had not undertaken a paperwork review, as required under the Paperwork Reduction Act, of the dress rehearsal, because there had not been a dress rehearsal form to review—a form that would go to a larger number of people and a form that would be a proposed form for the whole census, until June 17.

Senator **Sarbanes**. For 3 years, OMB has been chairing the Federal Agency Council, has been involved in trying to develop the content of the 1990 census questionnaire; correct?

Ms. **Gramm**. Yes.

Senator **Sarbanes**. In the course of these 3 years, there has also been a number of pretests by the Census Bureau pertaining to development of the 1990 census questionnaire.

Ms. **Gramm**. Yes.

Senator SARBANES. And those pretests have been reviewed by OMB; is that correct?

Ms. GRAMM. Yes.

Senator SARBANES. Now, literally a couple of months before the dress rehearsal, OMB has indicated very significant problems with a number of the questions.

Ms. GRAMM. It's 8 months.

Senator SARBANES. Considering the fact that you have been involved in this process for 3 years, how do we find ourselves in this situation, where OMB is proposing very significant reductions in the questionnaire at this late time in the process?

Ms. GRAMM. Well, first of all, as I stated earlier, the purpose of the Federal Agency Council was a different one, and the tests were for different purposes. This is the first time we have the dress rehearsal form or any form that households would have to fill out or be liable. It's mandatory—it's not voluntary, and that's very important. It is 8 months before the dress rehearsal. We have not—we are not making proposals.

Senator SARBANES. Eight months before the dress rehearsal?

Ms. GRAMM. The actual dress rehearsal; that's right.

Senator SARBANES. When is the dress rehearsal?

Ms. GRAMM. March 20, 1988. I might add, however, that some of the questions that we raise concerning the need, and so forth, we've been talking to user agencies about as well: What are you using the data for? Is it required by the Constitution for the census purpose, or is it required by some statute? We've asked questions like that over 3 years.

Senator SARBANES. All right. When must the questionnaire be cleared by OMB, in order to meet the dress rehearsal schedule?

Ms. GRAMM. Well, we have told the Census Bureau that the review period will be over around September 15, and we will proceed expeditiously then. I believe they would like to have it to the printers by October. The end of September or October.

Senator SARBANES. So the relevant date is not the March 1988 date for the dress rehearsal. The relevant date on the content of the questionnaire to be employed in the dress rehearsal is the end of September; is that not correct?

Ms. GRAMM. That gives them a lot of leadtime for the printing of the forms; yes.

Senator SARBANES. I must say to you, Ms. Gramm, I think the answer you gave me a couple of questions ago was, in effect, misleading. The relevant consideration, in terms of the amount of time that OMB is given before a decision has to be reached on clearing and printing the questionnaire is the end of September, not March 1988.

Ms. GRAMM. Well, we have every intention of going through the review and working expeditiously. Three months is what is indicated, and we have told the Census Bureau, and they've agreed to that. That's part of the Paperwork Reduction Act review process. I don't think that we're running into a time constraint yet. Just remember, something like the W-4 form, for example, where the IRS went out with that form, as you recall, then revised that whole form because of the burden on the public. They revised it, and they got it to the printers and out in a very short period of time. Obviously, that is probably more costly than a longer time period.

And we don't expect to have any problems with the census, I hope, in this process.

Senator **Sarbanes**. Well, my time has expired, and I am going to turn to my colleagues.

I would like to caution those who are going to testify subsequent to Ms. Gramm on the panels that we will reach them somewhat later than had been indicated when they were invited to testify. It's obvious why; I think we will need the extra time.

Let me just close with this observation. OMB has been involved in this Federal Agency Council for 3 years, the purpose of which was to shape the content of the 1990 census questionnaire. OMB has reviewed the pretesting, as this process has moved along, and now, literally at the 11th hour as we move toward the dress rehearsal, OMB has raised with the Census Bureau an extensive series of questions about a large part of the proposed survey. It really leads one to wonder what has been going on all these years.

Ms. **Gramm**. Well, it shouldn't be——

Senator **Sarbanes**. Why has the Federal Agency Council been considering census questions for 3 years, with OMB actually chairing the Council and reviewing the pretesting and only now do we get these proposed major reductions in the questionnaire?

Ms. **Gramm**. I don't want to repeat myself, so I won't, but there's another issue. When you review the content—a list of topics to be covered on a content test—that isn't necessarily a review of the total impact of all the questions as they appear on this particular form. Take the example on energy that I gave earlier. There are seven questions on fuel use on the long form, I believe, and the Department of Energy—or at least EIA—has indicated that maybe one would do as a benchmark to get the information. So the content is there, but maybe the other questions——

Senator **Sarbanes**. We will get into the specific questions and the substance of them. I am just trying to address the review questions.

Congressman Scheuer.

Representative **Scheuer**. Thank you, Mr. Chairman.

I welcome you here this morning, Ms. Gramm. You've always been a very highly intelligent and informative witness, and you have given us very interesting testimony today.

Let me ask, what is the basic thrust that you are after? Is it to reduce the mistake, the error rate? Is it perhaps to save some money on large samples, where a small sample would really do the trick, or is it really to eliminate a lot of the information that many, many, many portions of the public and government rely on to make intelligent decisions?

Which is it that you're after?

Ms. **Gramm**. Well, I think—what I am trying to do is, again, in the Paperwork Reduction Act, there are a number of issues that are important. Burden——

Representative **Scheuer**. Ms. Gramm, please I only have 10 minutes.

Ms. **Gramm**. Yes. Well, burden [laughter]——

Representative **Scheuer**. Just answer my question, if you would.

Ms. GRAMM. Look——

Representative SCHEUER. Are you just trying to be more cost effective and produce the same information, perhaps more inexpensively——

Ms. GRAMM. That is correct. But we have not yet made a decision.

Representative SCHEUER [continuing]. Or are you really trying to eliminate a lot of the information——

Ms. GRAMM. I'm not planning anything yet. It's not the end of the comment period.

Representative SCHEUER. Wait a minute, Ms. Gramm.

The Washington Post——

Ms. GRAMM. I don't—you shouldn't believe everything they said—and that's not [laughter]——

Representative SCHEUER. I'm not—I don't believe——

Ms. GRAMM. And that's not quoting me. That's not quoting—is that quoting OMB?

Representative SCHEUER. Let me just read you two sentences.

"The OMB has asked the Census Bureau to eliminate about half the proposed questions in the 1990 census."

Ms. GRAMM. Well, that's wrong.

Representative SCHEUER. Okay. Next question.

"The OMB informed Census officials that roughly 30 questions should be dropped."

Ms. GRAMM. No.

Representative SCHEUER. And that's in quotation marks. Is that wrong, too?

Ms. GRAMM. Wrong.

Representative SCHEUER. Well, it makes you wonder what you should believe.

Senator SARBANES. Did you raise very serious questions about 30 of the questions in the questionnaire and whether they should be there?

Ms. GRAMM. We raised questions about 30 of them. But again, these——

Senator SARBANES. After this long process, where this questionnaire has been shaped and evolved.

Ms. GRAMM. But not for Paperwork Reduction Act review.

Representative SCHEUER. But not what?

Ms. GRAMM. This is the first time we've seen the whole form, the whole package, you understand. This is the first time the form—the dress rehearsal form—is here, the one that is being proposed to be sent to 96 million households and the one that's being proposed to be sent to 16 million households and at a cost of $2.6 billion.

But let me say, this is not a matter of destroying information for cost reasons. That is not it at all. We are interested in the quality of data. Take the example that I just gave you. If people have a long form—the Census Bureau estimates a long form requires 45 minutes—you're sitting there filling out the form, and you're saying, "I've got to figure out how much flood insurance I've got, how much I paid. Why do they want my telephone number? What were my fuel costs last year? How much is my house worth? When was my house built?"

I worry about the quality of the data that the census may get, and very frankly, sometimes you can get better quality data. That's not saying you are eliminating it, but that you can get better quality data.

Representative **Scheuer**. Ms. Gramm, if all you are about is to effect some kind of improvement of the quality of the data, perhaps save vast portions of money from going from an enormous sample to a small sample, you wouldn't have this uproar. You wouldn't have all of the groups in labor, management, business, States, counties, Governors, mayors, Congressmen and Senators—we wouldn't be up in arms as we are now.

Has there been——

Ms. **Gramm**. I think there is a lot of misinformation out there, and that is why I am very glad this hearing was held, for people to understand that we haven't made any decisions yet. We also are concerned that if an agency doesn't include its justification in the record, then you're really in trouble with respect to the Paperwork Reduction Act. But let me also add that changing from a big sample size to a small sample size, that's probably not a big dollar issue. If the Census Bureau were not to collect the data on this census, but the Census Bureau were to do it on another form, for example, or the user agency were to do a large sample survey, that cost is going to be picked up. It might be shifted from one Census Bureau program to another or from the Census Bureau to other agencies.

Representative **Scheuer**. Let me ask you what you mean by that justification. How do you limit the amount of data and information that is educed by the census, by this justification. What are the criteria?

Ms. **Gramm**. The criteria specified in the Paperwork Reduction Act. First of all, the agency has to provide, under the Paperwork Reduction Act, for the public——

Representative **Scheuer**. Let's forget the Paperwork Reduction Act. This is a public policy question.

Ms. **Gramm**. No, it's the Paperwork——

Representative **Scheuer**. The census, for 200 years, has provided information, not only for government public policymakers, not only for the private sector decisionmakers, in every conceivable field of commerce, industry, production, goods and services, but also for scholars, for university scholars, for people who are studying what is happening to American life, the people who are trying to figure out what the problems are and what public policy decisions we have to make for the future.

Ms. **Gramm**. Right.

Representative **Scheuer**. Knowledge has a value in and of itself.

Ms. **Gramm**. I must——

Representative **Scheuer**. And the Census Bureau, to my mind, has never said that unless you can cite a specific agency need for specific knowledge, that that knowledge shouldn't be educed. It has been a repository for an enormously valuable variety of facts about every aspect of life, which have provided the fodder for public policy decisionmakers in government, for nonprofit groups, for religious and civic groups of every description, for business decisionmakers and also for scholars, for people who are thinking about

America, what our needs are, the goals of our country, which directions we're traveling, and this has been an invaluable enrichment to American life.

Are you now telling us that we have to justify every question in the census by the needs of some specific Federal agency?

Ms. GRAMM. First of all, a couple questions.

Let me say that we're just following the Paperwork Reduction Act—the Paperwork Reduction Act [laughter] requires us to have decisions made on the public record. But let me also address the question that you raised——

Representative SCHEUER. Don't talk about this Paperwork Reduction Act on my 10 minutes. Somebody else's 10 minutes. [Laughter.]

Ms. GRAMM. Let me talk to you then about the information and the data collection that's used by academics, et cetera, because I was an academic for 10 years, and I used a lot of data produced by the Federal Government. But let me also say—as you remember, if you recall my previous testimony—the Federal Agency Council members, agencies that are the users, do not pay for the data that they want to have in the census. The Census Bureau pays for it out of their $2.6 billion budget for the census.

As Mrs. Norwood said, they asked for more questions, and all agencies did, and if all of us researchers out there in the world, including myself, asked for all the information that we wanted in order to make good policy decisions, the census would be very large indeed.

As a matter of fact, what the Federal agency——

Representative SCHEUER. Let me ask you, why shouldn't the Census Bureau have sufficient staff and sufficient computer capability and collection of data capability to answer the questions that researchers need, that mayors, that Governors, that Congress and the Senate should need? What's wrong with that? Isn't that what the census is for?

Ms. GRAMM. There is an infinite number of questions that people might want to have answered. You will always have to be limited by the fact that a census form can only be so long; that the accuracy of responses on things like how much do you pay for utilities depends on how long that form is. You have to be concerned about a form being too intrusive. The Privacy Act requires that. When people feel as if a form is being too intrusive, then they don't respond to the form, or do not respond accurately.

Representative SCHEUER. I've been a Congressman for 20 years, and I can't remember constituents being concerned about privacy or being concerned about impositions on their time in answering these questions. I am sure there is some concern here and there, but it seems to me that on a cost-benefit basis, the benefits of the full flow of information about every aspect of American life that comes from these decennial censuses far outweighs, exponentially outweighs whatever the costs are to individual citizens who answer questions. I know there are certain privacy concerns from time to time, but we can meet those privacy concerns.

Now I know that there is an unquenchable appetite for facts, for knowledge, on the part of every aspect of American society—the business decisionmakers, the Government decisionmakers, the scholars. I'm not saying that there isn't some point of reductio ad absurdum in the production of knowledge and facts, but I don't think we have reached that yet, and I haven't heard from people out there, I haven't heard from the Brookings Institution or any of the think tanks that we have produced knowledge that really is trivial and not useful.

I am not saying that at some point in time, sure, there is isn't a point of diminishing returns in the production of knowledge, but that is not what we are talking about here. We are not talking about looking ahead and saying, look, at some point in time you have to cut it out.

Apparently, the public is concerned, and a sophisticated knowledgeable public is concerned that we are drastically cutting back. Now that may not be your intention, but it may be that you're, you know, the 600-pound canary. When you chirp, everybody gets very concerned. [Laughter.]

It may be——

Ms. **Gramm**. I must commend whoever suggested that we chirp, because——

Representative **Scheuer**. No, but I mean, when you send out waves that you want to have a drastic cutback or that is being contemplated——

Ms. **Gramm**. That is wrong. We only raised questions.

Representative **Scheuer**. If this is just a communications problem, I think all of us would be very much relieved. If, basically, that isn't your intent, and that you are simply trying to refine and produce more cost effective methodologies of generating this knowledge, none of us would be concerned in an occasional smaller sample or trying to eliminate the error rate and so forth. If that is what it is all about, we will leave this hearing very much concerned.

What we are concerned about and apparently what a lot of other sophisticated people in the leadership of labor, industry, academe, and so forth, are also concerned about is that you are really trying to slash knowledge, and we would be very concerned about that.

I have to add as a postscript, that part of our foreign aid program, Ms. Gramm, as you very well know, you are an extremely knowledgeable person, is to help nations in the underdeveloped world develop their census procedures, to help them acquire the facts, the data about every aspect of their national life, so that they can identify problems, and so that they can achieve cost-effective, thoughtful solutions to their national problems.

Doesn't it seem anomalous that at the same time we are helping dozens of less developed countries around the world produce the facts that can help them make intelligent decisions about their national problems, that we are apparently, and I hope this is not true, but there is a fear at least that we are trying to reduce, significantly, the flow of facts and data, relevant, meaningful data to decisionmakers in every aspect of American life that helps us identify problems and helps us identify thoughtful, cost effective solutions to our problems?

Doesn't that concern you?

Ms. **Gramm**. Well, I agree with you. I agree with what we ought to be trying to do here. And one of the reasons why I am glad this hearing occurred is, I do think there has been a lot of misinformation out there about what we are about. We are not trying to cut back whole scale on information collecting at all, on collecting information that would be needed for policymakers. I also would point out that all censuses have changed—our censuses have changed over time. I think the census of agriculture got split off from the population census, for example. The questions change over time.

We dropped the question about bathrooms, I think. That kind of process is an ongoing one. I am glad at this hearing to say that we don't have any preconceived notions out there. We are not talking about cut, slash, and burn here. We are interested in receiving public comments. We are interested in receiving public comments. We are also interested that the record is properly built—that it has the information there.

And very frankly, I think someone should raise the question whether or not you want to ask every single household: how many rooms they have or the value of the house, given the quality of information that you may get out of that, and whether or not you need seven fuel use questions versus one benchmark question.

But that is not necessarily saying that even if they were dropped out of the one in six sample, people would not be getting the information at all or the Federal Government would not be producing it.

Representative SCHEUER. Thank you, Mr. Chairman.

Senator SARBANES. I might just note, Congressman Scheuer, that it is my understanding that the questionnaire developed by the Census Bureau and to which OMB has raised these objections we are discussing, that that questionnaire in length and in number of questions tracks the previous census questionnaire. So there's not been an expansion in the census questionnaire which the Census Bureau has developed.

Congressman Hawkins.

Representative HAWKINS. Thank you, Mr. Chairman.

Ms. Gramm, I conclude from your statement that we seem to be criticizing you for the mistakes you haven't yet made. [Laughter.]

Ms. GRAMM. Yes, that's right [laughing].

Thank you for preventing me from making mistakes!

Representative HAWKINS. Well, that's the next question. How can we do that? [Laughter.]

My understanding further is that you are in the process of reviewing the dress rehearsal questionnaire; is that true?

Ms. GRAMM. Yes.

Representative HAWKINS. On the third page of your prepared statement, you indicate in the next-to-the-last paragraph that the Bureau of the Census proposes to use in 1990 a census, this will be dress rehearsal one. And then, "On April 1, 1988, the Bureau of the Census"—I am reading verbatim now—"is to submit to its authorizing committees in Congress a report containing the proposed."

Now what will they report on April 1, 1988, to the Congress, the results of the dress rehearsal or the questions they will use during the dress rehearsal because it seems that the questions they will use will be those that have been reviewed and approved prior to April 1, 1988? What role, then, does the Congress play in the questions that are going to be used in 1990?

Can you clarify it?

Ms. GRAMM. Well, I am not as familiar with what happened before, but I suppose that in 1988, they will be reporting to you about their dress rehearsal, and I guess that if you have comments or questions, we still have some time before the 1990 census so that you may raise some questions.

Representative HAWKINS. It seems a report to the Congress comes after the dress rehearsal questions.

Ms. GRAMM. Ms. Tella, who is my chief statistician here and head of the Statistical Policy Office, says that the law requires that they report to Congress on April 1, 1988, the questions that they intend to use for the 1990 census, and any revisions that may come about, they would also have to report to you.

Representative HAWKINS. I'm not clear what they report. Will they be reporting the questions which were used in the dress rehearsal?

Ms. GRAMM. If, for example, they were to do the dress rehearsal and decided to make a change, they would report it to you. But what they are required to do is to report the questions that they intend to use, the questionnaire they intend to use, in the 1990 census.

Representative HAWKINS. Well, they will refine the questions which they had used in the dress rehearsal; is that proper to say?

Ms. GRAMM. I don't know.

Representative HAWKINS. Is that a proper statement?

Ms. GRAMM. It is a dress rehearsal——

Representative HAWKINS. I am trying to see at what point will it be possible to change the plan which has been at least publicized, incorrectly, perhaps, but which we have reason to believe would not allow a correction of the 1990 census.

What steps should be taken to refine the questions or to permit some refinement prior to the time of the dress rehearsal?

Ms. GRAMM. Prior to the dress rehearsal? We have a——

Representative HAWKINS. Just public comment——

Ms. GRAMM. Yes.

Representative HAWKINS [continuing]. I understand that, but not in the report to the Congress and to the committees of the Congress.

Ms. GRAMM. That's a report to Congress, but I suspect that Congress could also make their views known to the Census Bureau if they have some concerns about what the Census Bureau reports to them, as what they plan to use in the 1990 census. So after that report, you also have a chance to comment, and if they revise the questions, they have to send another report to you, and you can comment again.

Representative HAWKINS. Well, I suspect it is going to be too late, but let's shift——

Ms. GRAMM. Oh, no. In 1988—April 1, 1988.

Representative HAWKINS. Well, you are not going to go back and review and change, I suspect, and I suspect that even the Congress isn't going to be able to agree; however, let's go to another question on, not only the quantity of the data to be used, but the quality of it.

In the review that you do, and in consultation with the various Federal agencies, what power do you have, in terms of actually reviewing the quality of the question as well as a reduction in the paperwork, which to me, is rather useless, in many respects, because if I know OMB, they are going to recommend the least amount of expenditures.

Ms. **Gramm**. No——

Representative **Hawkins**. But let's shift away from my opinion, but to the actual question of the quality of the question. Let me use an example. We recognize that in unemployment data that we get all sorts of definitions. You're going to go out, you're going to ask questions concerning unemployment, employment conditions. Whether or not you ask an individual if you've been unemployed, how many hours have you worked? The Bureau of Labor Statistics of the Department of Labor would count as employed any individual that had been employed at all, let's say, during a period of time, whether that was 1 hour, whether it was full-time employment.

On a question such as that, would you, in effect, have anything to do with the definition of what is an unemployed person, or would you go into it. Or would you simply accept what is currently being used in order to determine the accuracy of the unemployment conditions throughout the country? If an individual, let's say, has been employed 1 or 2 hours a week and counted as employed, which would be very deceptive, it would seem to me, to what extent would you have the power to, let us say, overrule or to determine the accuracy of the information collected, because it is obvious that some useless information could be collected.

Ms. **Gramm**. Your question——

Representative **Hawkins**. What is your role, in other words——

Ms. **Gramm**. Our role with respect to the quality of statistics is one that is also defined under that law that I keep referring to, the Paperwork Reduction Act. The Paperwork Reduction Act gives us the responsibility to ensure that statistics are useful, and that implies accuracy and reliability in the data. Usefulness implies something that, I think, relates to some of the problems you are alluding to here.

Your issue is a little bit broader than the census issue, but I would like to just spend a little time addressing it. In our statistical policy and coordination function, we work with the agencies.

We have a statistical policy directive No. 3, that we issued in the fall of 1985, where we asked the agencies that produce economic statistics to review—to do a self-evaluation and review—these statistics periodically for quality and usefulness. That is something that we have been working with the agencies on.

You raise a very difficult question, and that is true of statistics whenever you look at a number and then start delving behind the numbers as you do.

Very often, a statistic is a—well, it is an indicator of some, say, economic condition, but by definition, as a statistic, it masks over a lot of variations in the unemployment——

Representative **Hawkins**. Let's try to clarify it. If, in connection with the example I cited, an individual responds that I am employed—do you follow up then to ask how many hours were you employed, or would you consider that to be a question that would not help from a cost point of view to begin asking such questions, breaking them down and, let's say, expanding the questions asked and, therefore, have a much larger and more costly form, because of the cost?

Do you look at it from the viewpoint of the cost or from the viewpoint of the accuracy and the quality?

Ms. **GRAMM**. I think there is a tradeoff, and every time—and again—let's separate it just from the census. The question is whether you want to ask seven questions on this census about unemployment, for example, or whether in order to get accurate and high quality data that might be helpful to policymakers on umployment, you would want a survey that looks more deeply behind unemployment statistics. You might develop it. Now that might be more expensive per respondent, but you might have a smaller sample size, and therefore, you can use—just like the energy example that I gave before—you might use the census as a benchmark. But you might then have the unemployment statistics developed or collected on other forms that the BLS or some other agency might undertake. And that is probably what actually happens with respect to some of the unemployment and employment figures.

Representative **HAWKINS**. Ms. Gramm, thank you. I will follow up that question some other time, but my time has expired. Thank you.

Senator **SARBANES**. Congressman Dymally.

Representative **DYMALLY**. Thank you, Mr. Chairman.

Ms. Gramm, I have had the privilege of hearing your testimony before the Committee on Post Office, the subcommittee which I Chair, and I have always come out of it with admiration for your well-researched and scholarly approach. But today wasn't one of your good days. You were evasive, irrelevant, rambling, and not at all answering the questions posed to you by the members.

Let me ask you this. Did OMB or someone or someone in OMB take a pen and cross those questions——

Ms. **GRAMM**. No.

Representative **DYMALLY**. Where did that come from?

Ms. **GRAMM**. I don't know.

Representative **DYMALLY**. It dropped from a tree.

Ms. **GRAMM**. I don't know. Where did it come from?

Representative **DYMALLY**. How did the Census Bureau get it?

Ms. **GRAMM**. I don't know.

Representative **DYMALLY**. It just happened and dropped in?

Ms. **GRAMM**. We did not send over anything like that.

Representative **DYMALLY**. Somebody from the Joint Committee slipped it under the door of the Census Bureau?

Senator **SARBANES**. No. I think that probably in fairness to Ms. Gramm, we prepared that on the basis of the information we had received as to questions which OMB had indicated to the Census Bureau should come out of this questionnaire. Ms. Gramm, as I understand her this morning, is asserting that they raised concerns or doubts about these questions, and, in effect, raised the point as to whether they should be in the questionnaire or not. So there is some difference of opinion as to whether they actually said those questions should come out or, in effect said, well, they're targets for coming out.

And the X's were what we developed to indicate graphically what would happen to the questionnaire.

Representative **Dymally**. Thank you. Mr. Chairman——

Ms. **Gramm**. What——

Representative **Dymally**. May I finish, Ms. Gramm?

Let me read you a statement from the Census Bureau.

"On Friday, July 24, 1987, the Office of Management and Budget informed the Census Bureau that roughly 30 questions should be dropped from questionnaires submitted for approval to be used in the 1988 census dress rehearsal."

I raise that, because you have given the impression that what you did for the last years was just sit and have a little buddy-buddy chat, and this is not very serious. We haven't made up our minds, but yet the Census Bureau has issued a lengthy bulletin, based on the communication from OMB.

So you cannot dismiss this whole process as being slightly casual.

Ms. **Gramm**. That was from the Census Bureau? I would appreciate seeing it. They certainly didn't show that to us, because that is incorrect.

Representative **Dymally**. All right.

Ms. **Gramm**. That is absolutely wrong, and I think that's—pardon me—I think that is irresponsible of Census Bureau to——

Representative **Dymally**. All right. So you are saying that the Census Bureau is irresponsible in issuing this statement?

Ms. **Gramm**. In issuing the statement that OMB has suggested this.

Representative **Dymally**. So OMB has not suggested this to the Census Bureau?

Ms. **Gramm**. That is right. OMB has not made its proposals, any proposals. We have not concluded anything.

Representative **Dymally**. This statement from the Census Bureau is not accurate?

Ms. **Gramm**. We haven't seen it. I would like to see it.

Representative **Dymally**. All right. I would be glad to give you a copy.

Ms. **Gramm**. That would also explain all the concern that people have raised, because that is an inaccurate statement.

Representative **Dymally**. When you first—you never communicated with the Census Bureau then about your intention to eliminate questions on the form?

Ms. **Gramm**. We haven't made a decision. We don't have a decision yet.

Representative **Dymally**. That was not the question.

Ms. **Gramm**. We have communicated with the Census Bureau; yes. We have raised questions; yes.

Representative **Dymally**. All right. And therefore, the Census Bureau, on the basis of your communication, issued this memorandum?

Ms. **Gramm**. I don't know if they did or not.

Representative **Dymally**. All right. Okay.

Now when you first communicated with the Census Bureau, they were opposed to your proposal and communicated that information to a number of professional groups across the country. Yesterday, they changed their position.

Did OMB instruct them to change their position?

Ms. **Gramm**. No. But a lot of questions came in to us. I was supprised, and I told my staff, this is the start of the Paperwork Reduction Act review process. The Census Bureau must be confused, if they think that we have made our Paperwork Reduction Act decision already. That is premature for us.

Representative **Dymally**. So in all of your communications with the Census Bureau, somehow they managed to issue a major statement without recognizing that you were not serious in your communication with them?

Ms. **Gramm**. Our communication with them surely was serious. We ought to be concerned about——

Representative **Dymally**. If you were serious, then they responded to your seriousness by issuing this memorandum.

Ms. **Gramm**. No. We never proposed cutting out or eliminating questions from the census. We haven't made a proposal yet. We did not make proposals on that.

Representative **Dymally**. That is very interesting.

Ms. **Gramm**. I mean, it's——

Representative **Dymally**. That is very interesting, and it is contrary to what I have heard you say in the past, but anyhow Ms. Gramm, you made your entire case on the Paperwork Reduction Act. The Paperwork Reduction Act does not give you a hatchet to destroy history, tradition, and statistics in the Census Bureau. In fact, there are court cases——

Ms. **Gramm**. I am not planning to.

Representative **Dymally** [continuing]. Which I will cite to you by giving you some memoranda, and the Federal statute gives the housing mandate in the census over the Paperwork Reduction Act. And I don't know why you want to think that because of the Paperwork Reduction Act, you are going to destroy this whole process, which has been so helpful in bringing your scholarly approach to these matters, information, and to other agencies information and to the private sector, information that is required in the planning of housing.

The Paperwork Reduction Act, Ms. Gramm, doesn't give you that mandate to do that. It may give you some direction to reduce paperwork, but it doesn't give you a mandate to destroy the Census Bureau form.

Ms. **Gramm**. We are not planning to destroy the Census Bureau form.

Representative **Dymally**. Now, the second point you made——

Ms. **Gramm**. The Paperwork——

Representative **Dymally** [continuing]. Is this old question about money. Of course, it costs money. It costs money to build the jet fighters we have. But it is an important process which takes place every 10 years, and the public has never protested paying for the cost, and I don't know where OMB gets its mandate to arbitrarily begin to reduce the cost of the census undertaking.

Ms. **Gramm**. The cost to the Census Bureau was not an issue in this at all.

Representative DYMALLY. It was an issue with you here this morning.

Ms. GRAMM. No. I mean, the cost to the Census Bureau is not the issue here. We are just undertaking a Paperwork Reduction Act review. But let me say, though, that when I was up before the committees at the joint hearing in May, testifying before you, Congressman, the issue of the budget was one that was of great concern to the committees. And as a matter of fact, I said, I don't do the budget, but I will go back and ask people to provide information on the Bureau of the Census budget, but that is not the driving force here in our Paperwork Reduction Act review.

Representative DYMALLY. If you are still committed to the Paperwork Reduction Act, why didn't you stop the W-4 form? You didn't stop it. It was the public.

Ms. GRAMM. We reviewed it under the Paperwork Reduction Act.

Representative DYMALLY. It went out anyway. It was the public that protested and the Congress that protested. It wasn't OMB.

So I don't understand why in this case, you are so committed to the Paperwork Reduction Act, but on the W-4, you let it go out all over the country.

Ms. GRAMM. As I stated earlier, the whole purpose of the Paperwork Reduction Act is to get public comment involved—get the public involved.

Representative DYMALLY. But you never exercised the mandate on the W-4 form, but you want to exercise it now.

Ms. GRAMM. The public became involved in the W-4 issue, and they were involved——

Representative DYMALLY. After you let it out, not before.

Now you don't even give the public a chance to act on this.

Ms. GRAMM. This is their chance now. This is the review period now. That is the whole point.

Representative DYMALLY. Ms. Gramm, you testified before the Subcommittee on Census on May 14. At that time, you made no comments on the justification for various census questions or the burden on the public.

Now I fully understand you still had to review this by the time you made those comments. Now you've come here with these recommendations on the census, wherein you're saying to the Congress that these were not recommendations, they were just casual conversation.

Is that right? Is that what you're saying to us?

Ms. GRAMM. These were questions that we raised. We have not made our recommendations yet to the Census Bureau because it is, again, the start of the public comment period.

As I stated in my May testimony, we had not undertaken the paperwork review. We would be undertaking the paperwork review as soon as we got the dress rehearsal form in, which we did. This is the first time.

Representative DYMALLY. But wasn't there some discussion in your task force about this whole process, the whole question? For 3 years, you sat and talked and didn't even know what was going to be in the form? Had no idea until they gave it to you?

Ms. GRAMM. No. The purpose of the Federal Agency Council——

Representative DYMALLY. What do you need to talk about?

Ms. GRAMM. They discussed other questions. For example, as Mrs. Norwood indicated, there are a lot of agencies that came up with other questions that they might want included in the census as well.

Representative DYMALLY. Maybe there might need to be a reduction? I mean, you were talking——

Ms. GRAMM. There was some. There were——

Representative DYMALLY [continuing]. For 3 years and nothing has come out of these conversations that you've had with the Census Bureau?

Ms. GRAMM. Because this is the first time the whole form was put together.

Representative DYMALLY. But you didn't know anything about the content that was being developed in those 3 years of conversations?

Ms. GRAMM. The content and discussion of individual questions is different from the whole form when it is put together.

Representative DYMALLY. Did somebody say to you, "We're going to have some housing questions?" There are about 30 areas we're going to delve into?

Ms. GRAMM. We raised questions about——

Representative DYMALLY. I mean, did anyone at all——

Ms. GRAMM. Yes, we did. During that period, during the 3 years, we asked the agencies for, and talked to them about the need for the data and the use for the data.

And that's what needs to be in the public docket for this——

Representative DYMALLY. Well, as a professor, you know about grades. I'm going to give you an "I" in this testimony.

Senator SARBANES. Ms. Gramm, I have, in closing, just a few questions. Senator Bingaman could not stay, although he's very interested in this subject matter, and he asked me to put these questions to you.

Why did OMB decide to cut the supplementary questions asked on Indian Reservations in 1980, which are not scheduled for inclusion in the 1990 census?

Ms. GRAMM. Those questions haven't been proposed by the Census Bureau.

Senator SARBANES. Pardon.

Ms. GRAMM. Those questions have not been proposed by the Census Bureau.

Senator SARBANES. What's your position on the questions?

Ms. GRAMM. I don't know the questions.

Senator SARBANES. Do you have a position on them? The repeat of the 1980 questions?

Ms. GRAMM. I don't have a position on them.

Senator SARBANES. Do you recognize that it may be necessary to ask questions that affect a small proportion of the population—for instance, Native Americans—in order to obtain information, even though they don't meet the standard that you've set out here about being nationwide in scope?

Ms. GRAMM. I think that there could be good statistical reasons why you might need to include some for small sample purposes. And you——

Senator SARBANES. Pardon.

Ms. **Gramm**. American Indians would be identified in the 100 percent sample.

Senator **Sarbanes**. I thought you wanted to elaborate. Fine

I want to address the figure that appears in your prepared statement before it begins to gain circulation in terms of its justification. It is your estimate that the burden to the public of doing the questionnaire will be $450 million.

Ms. **Gramm**. The estimate, as I stated there, the estimate of the burden, the time burden, the time burden on the public, is an estimate given to us by Census Bureau.

And all we did was say: If you were to value it at $15——

Senator **Sarbanes**. Now, how do you value it at $15 an hour? I tried to figure that out.

Ms. **Gramm**. Well, that's why I put the assumption in there. If you were to value it at $5 an hour, it would be less.

Senator **Sarbanes**. I understand that. If you valued it at one, it would be even less than that.

Ms. **Gramm**. That's right. [Laughter.]

Senator **Sarbanes**. But, $15 is what you're using.

Ms. **Gramm**. No, there's no magic to that at all.

Senator **Sarbanes**. This is the figure that was in your prepared statement. Therefore, it gains a certain amount of credence in circulation.

You know, $15 an hour is a good wage in America. If you earn $15 an hour, you are well above the median in income in this country.

Do you understand that? Do you agree with that? You don't quarrel with that statement?

Ms. **Gramm**. What is the median income? The median income is around $29,000 for heads of households. At 2,000 hours of work a year, that is about $14.50 an hour.

Senator **Sarbanes**. So you're using a figure that is grossly overstated for purposes of calculating the burden. I'm not going to make a big thing out of this point, but I want it to come out of these statements.

I don't want you saying that the burden to do the questionnaire is going to be $450 million based on an assumption that the average value of people's time doing the questionnaire is $15 an hour. The majority of Americans don't make $15 an hour.

Ms. **Gramm**. Would the majority of heads of households make more than $15 an hour?

Senator **Sarbanes**. No.

Ms. **Gramm**. Be happy to change it to $10. [Laughter.] $5? [Laughter.] I thought about putting in a sensitivity analysis just in case people would get concerned about that number.

Senator **Sarbanes**. The average median hourly earnings according to the BLS is just over $10 an hour. And the average——

Ms. **Gramm**. That's the average median hourly.

Senator **Sarbanes**. The average gross hourly earnings, according to the Economic Indicators, are: nonagriculture, $8.96; and manufacturing, $9.80.

In any event, let me turn finally to this Census Bureau statement that you were discussing earlier with two of my colleagues.

The Census Bureau said:

"On Friday, July 24, 1987, the Office of Management and Budget informed the Census Bureau that roughly 30 questions should be dropped from questionnaires submitted for approval to be used in the 1988 census dress rehearsal."

It's your testimony this morning that that is not correct, that there must have been some miscommunication, I take it, and that you did not inform them that roughly 30 questions should be dropped from the questionnaire.

Is that right?

Ms. **Gramm**. That's correct.

Senator **Sarbanes**. If that statement had read as follows, would it have been accurate:

"On Friday, July 24, 1987, the Office of Management and Budget informed the Census Bureau that roughly 30 questions are under consideration for elimination from questionnaires to be used in the 1988 census dress rehearsal."

Ms. **Gramm**. I don't think that would be accurate either.

Senator **Sarbanes**. You don't think that would be accurate?

Ms. **Gramm**. We felt that for 30 questions we needed to have some more justification for the record. That doesn't mean that we thought any or all of them ought to be or needed to be dropped. There might be other ones in there that——

Senator **Sarbanes**. That what?

Ms. **Gramm**. That might not be justified. I don't know.

Senator **Sarbanes**. Oh, you think there are additional questions? [Laughter.]

Ms. **Gramm**. Someone might identify a real problem with one of those questions in the public comment period.

Senator **Sarbanes**. No. I'm very interested in this. You think that there are additional questions besides the 30 that are in jeopardy for inclusion in the questionnaire?

Is that correct?

Ms. **Gramm**. Yes, but I have not—I personally don't think there are any questions yet that need to be dropped from the census.

Senator **Sarbanes**. No, I'm trying to lead you through this. And you say you did not tell them that they should be dropped.

The next question is whether you informed them that they were under consideration to be dropped from the questionnaire.

Ms. **Gramm**. No, that is wrong. My staff, we said they were inadequately justified for the record.

Senator **Sarbanes**. They were what?

Ms. **Gramm**. They were inadequately justified for Paperwork Reduction Act record purposes.

Senator **Sarbanes**. And, therefore, would be under consideration to be dropped if they weren't justified?

Ms. **Gramm**. No, and therefore the Census Bureau needed to make sure that its submission was sufficient, sufficiently justified, as required by law. Therefore, we wanted them to provide us additional justification.

Senator **Sarbanes**. All right. Thank you very much.

We appreciate your appearing this morning and your testimony. It's a matter that, obviously, the committee is very interested in. And it's a matter that we have followed closely, as you know, from our previous hearings.

In fact, let me just close with this question, Ms. Gramm.

In the extended hearings that we had last year on statistics, at one point, I asked you if you believed that the census should be shifted to a voluntary basis. Of course, now it's not done on a voluntary basis. It's done on a mandatory basis.

And your response at that time, was, quote, "It might be. I would want to look at it very carefully."

And my question is: Have you looked at it carefully, and what is your conclusion?

Ms. **Gramm**. Having become a lot more informed about the census in the past few months, the census is required by the Constitution, and it's very important for redistricting and apportionment concerns.

And, therefore, I think it's important that we do have a real head count, one that it is mandatory.

Senator **Sarbanes**. So, therefore, it cannot be done on a voluntary basis, I take it?

Ms. **Gramm**. That's right. We need to be able to do a head count of everybody.

Senator **Sarbanes**. Thank you, Ms. Gramm. We appreciate your testimony.

Ms. **Gramm**. Thank you. And I appreciate your hearing because I do want to clear up any misconception that there might be out there about our so-called proposals, because they are not that.

Thank you.

Senator **Sarbanes**. We'll now go to the panel of private sector experts. Michael Carliner, who is the staff vice president of the National Association of Home Builders; Joseph Duncan, the corporate economist and chief statistician of Dun & Bradstreet Corp.; Henry Schechter, director of the Office of Housing and Monetary Policy at the AFL/CIO; and Rachel VanWingen of the American Library Association.

Mr. Duncan, I understand that you have a plane to catch and, in recognition of that, we'll take your testimony first. Then we'll take the balance of the panel. If your time is such that you can still be with us for questions, fine. If you have to slip away, we understand that.

STATEMENT OF JOSEPH W. DUNCAN, CORPORATE ECONOMIST AND CHIEF STATISTICIAN, DUN & BRADSTREET CORP.

Mr. **Duncan**. Thank you, Mr. Chairman. I did interrupt another business trip to come to this hearing because I am one of those people representative of the private sector who have been informed of the concern over the content of the 1980 census. I was informed on Tuesday of this week, so I'm a week or so behind the Census Bureau.

I have a prepared statement, which I would like to submit to the record, Mr. Chairman.

Given the discussion that has already taken place, and since I spent 8 years working with paperwork reduction issues under the Federal Reports Act, and also helped draft the Paperwork Reduction Act, I think it might be helpful to note a couple of important points at this time.

The first point I would make is that, as noted in Ms. Gramm's testimony, OMB reviews 3,500 forms a year with, as you know, a modest staff. So it is somewhat easy to understand how miscommunication and misunderstandings can occur if there is not an intensive analysis of all of the technical and substantive material associated with some of the forms.

An example of that is the W-4 from the standpoint of its impact on tax collection.

The OMB is, of course, indeed a 600-pound canary. People do listen to what is suggested. From the point of view of the process, therefore, it's easy to understand that if there is substantial justification for questioning an individual question, that question is subject to deletion at the end of the process.

So I certainly understand how the Census Bureau could now hold the view that if OMB did not feel there was sufficient justification during the 2 years of discussion with the Interagency Council that the Census Bureau has at no risk on those questions.

I represent a concern that grows out of not only having worked with the Paperwork Reduction Act, but that also grows out of my current work in the private sector.

We recognize that, in fact, an entire industry has been build up around information collected from the public and at public expense, because the interpretation, analysis and use of that data require an enormous set of resources that go beyond the resources of the Federal agencies.

I would like to submit for the record a letter from Mr. Kenneth Hodges, one of our demographers at Donnelley Marketing, a Dun & Bradstreet company. Let me just quote from the first paragraph of his letter:

"We at Donnelley Marketing are alarmed by the massive cuts recommended by OMB for the 1980 census questionnaire. The proposed cuts are so sweeping as to significantly diminish the scope of the census, and impair our knowledge of the U.S. population. While Donnelley Marketing and other private firms produce original and valuable demographic data, the private sector cannot be looked to as an alternative to the decennial census. The census is a unique and irreplaceable source of qualify information, and its diminution benefits no one."

End of quote from Ken Hodges.

I would also like to submit for the record a letter that is being jointly prepared by Donnelley Marketing, CACI, the National Planning Data Corporation, Claritas, Urban Decision Systems, and National Decision Systems, those firms representing a sample of the private sector interest in the data that flows from the census itself.

Senator SARBANES. Those letters will be included in the record, sir. Thank you, sir.

Mr. DUNCAN. Thank you very much.

In my prepared statement, however, I have focused on the Federal justification for the census. The priorities behind the design of the census are priorities that derive from Federal agencies.

We heard this morning about the role of the Interagency Council in reviewing what kind of information would be necessary for the proper administration of public programs. And having been responsible for the Interagency Council to the 1980 census, I assure you that Ms. Gramm is, indeed, correct:

The interests, needs and desires of the Federal agencies far exceed the capability of the Census Bureau or of the American public to respond, because there are many details of our lives that are influenced by public policy.

Therefore, having been involved in the review for the 1980 census, I'm quite certain that a huge number of proposals were on the table during the review process for the 1990 census.

The purpose of the review process is to reduce all of the requests to a manageable task. And that is what the Census Bureau presented in its original design for the 1988 dress rehearsal.

In my testimony, I suggest that it might be appropriate to lengthen the review comment period since it is revolutionary, at the end of this long review process, to propose deletion, or at least to question the justification for a huge part of the census.

Ms. Gramm said the 90-day period ends on September 15. I would suggest to this committee that the real starting date was July 24, when the whole process, in effect, was turned upside down. That would mean we would have until the end of October.

This, however, creates serious problems for the Census Bureau in terms of getting the forms printed in time to undertake the survey.

I would suggest another alternative. Let the dress rehearsal, as designed by the Interagency Council and the Census Bureau, move forward. If there are, indeed, questions that flow out of the dress rehearsal itself, it is a relatively simple task to modify, based on the experience of the dress rehearsal, the questions that don't seem justified or that yield low quality information.

If the questions are eliminated before the dress rehearsal, it is not possible to reintroduce them into the final census because there will have been no research behind that activity.

This committee may wish to work with other committees of Congress to determine if that's an appropriate approach.

The other area I want to comment on relates to just one set of questions. Janet Norwood testified earlier this morning about the importance of labor information.

I'd like to read a part of my prepared statement that deals with labor force questions. I'm commenting from the perspective of a corporate economist:

"It is difficult to analyze the U.S. economy today because of the increased labor force participation resulting from two and three wage earners in individual households.

"This is further complicated by the growing importance of part-time and temporary employment."

I would note that Janet Norwood talked about that this morning.

"Thus, these questions are needed in the census so that we can accurately evaluate the economic health, well-being and future characteristics of the labor force. Elimination of the decennial census topics on labor force status would impair our ability to understand the sample measures that are routinely collected in both the Current Population Survey of the Census Bureau and in the Establishment Survey of the Bureau of Labor Statistics."

I would underscore the fact that the census, which is done every 10 years at very fine grain detail covering every household in the country, is the benchmark for all of the small area estimates that we use for public policymaking and for analysis of subsequent surveys such as the sample survey of the Current Population Survey.

Frequently, the benchmark character of the census is not fully appreciated. It's absolutely essential to the quality of statistics in the 10-year period between censuses.

I'll end my statement at this time, Mr. Chairman, and I will be available for questions after the rest of the panel completes its testimony.

Senator SARBANES. Your prepared statement will be included in the record.

[The prepared statement of Mr. Duncan, together with the letters referred to for the record, follows:]

PREPARED STATEMENT OF JOSEPH W. DUNCAN[1]

Mr. Chairman and Members of the Committee:

I am pleased to have this opportunity to offer some views concerning the proposed reduction in the number of questions to be included in the 1990 Decennial Census. It is my understanding that a very recent (July 24, 1987) proposal by the Office of Management and Budget (OMB) calls for the elimination of approximately 30 questions from the Census. This proposal was made as part of OMB's review of the forms to be used in the 1988 "dress rehearsal" for the 1990 Decennial Census.

(1) Mr. Duncan is chairman of the Statistical Committee of the National Association of Business Economists (NABE). From 1974 to 1981, he was responsible for statistical policy at the Office of Management and Budget and in the Department of Commerce.

In my testimony I will to focus on two specific issues:

1. The process used for deciding upon such a significant reduction in the scope of the Decennial Census.

2. The significance and implications of eliminating individual items of information.

Issues of the Review Process

The development of a Decennial Census is a major and far-reaching effort on the part of the entire federal statistical establishment. Typically, government agencies participate in a 90-agency committee called the Federal Agency Council to prepare for the Census. This committee reviews the needs of agencies of the federal government for information required in the administration of specific legislative programs. During the time that I was responsible for federal statistical policy (1974-1981, including the 1980 Census), I learned that the level of detail desired by the federal agencies far exceeds both the capabilities of respondents to provide the information, as well as the capabilities of the Census Bureau to collect and edit it. Therefore, it is inevitable that agency needs are not fully satisfied.

While I have not been a participant in the inter-agency council planning the 1990 Census, I am confident that great care was taken by the committee to develop a reasonable trade-off between the needs of the agencies and realistic expectations for collecting Census statistics in the 1990 Census. Since this committee was chaired by the OMB, it is rather remarkable that its action should overturn the results of three years of careful review, analysis, and development of specific recommendations.

There is indeed a long history of concern in the federal government about reducing the reporting burden imposed by the government on the general population and on businesses. In fact, in a historical review I wrote in 1976, it was noted that President Franklin D. Roosevelt asked the Central Statistical Board to minimize the government reporting burden on the public.

As a by-product of established government regulations during World War II, Congress passed the Federal Reports Act of 1942 which specifically directs the Bureau of the Budget (now OMB) to review all agency requests for information to assure that there was no duplication of information collected and that the information requested was truly required. In the late 1970s, I worked in support of the Federal Paperwork Commission toward this important objective. The Commission's findings were implemented by the Congress in the Paperwork Reduction Act of 1980. In fact, this is the legislation that has led to OMB's plan to eliminate a number of questions from the 1990 Census.

We all agree that paperwork reduction is important and necessary. However, the history of the role of the federal government suggests that the Constitutional requirement for a Decennial Census was established not only to determine political representation, but to provide basic information for public policy development. In other words, the Census provides information to assure that government policies are responsive to the nation's changing demographics. Thus, data and information that have historically been useful should only be eliminated with great care and consideration of the social costs involved. Sound policy cannot be formulated without adequate information.

The design of a Decennial Census is a highly complex operation. If questions are eliminated at the time of the "dress rehearsal," they are unlikely to be reintroduced to the actual Census. In effect, OMB is bypassing the traditional Congressional, public, and private recommendation process by making precipitous decisions that, essentially, cannot be reversed.

Therefore, at the very least, I strongly recommend that the deadline for approval of the "dress rehearsal" be extended to provide a period of public and Congressional input before the OMB recommendations are implemented.

Now I would like to offer some comments concerning the implications of some of OMB's recommended deletions.

Comments on Specific Issues

About two-thirds of the questions recommended for deletion from both the completed coverage and the sample questions relate to housing characteristics. These include two 100 percent questions (rent and valued housing), which are proposed to be eliminated entirely from the Census. The remainder of the 100 percent housing questions (units and housing) are recommended to be moved to the sample portion of the Census.

Further, approximately 15 subjects relating to housing are identified for elimination from the sample questions. It is my understanding that a number of other witnesses will focus on the importance of these housing questions, particularly programs associated with the Department of Housing and Development. If that is not the case, I would be pleased to submit further testimony concerning the implications of eliminating information about the character and quality of housing in the nation.

The remaining deletion proposed by the OMB includes three employment questions, as well as items related to migration, mobility patterns, and fertility. These questions have historically been included in the sample portion of the Decennial Census and have proven to be very useful.

As an economist, I want to underscore the importance of the three employment questions that are recommended for deletion. These questions are designed to determine the full scope of labor force participation.

It is difficult to analyze the U.S. economy today because of the increasing labor force participation resulting from two and three wage earners in individual households. This is further complicated by the growing importance of part-time and temporary employment. Thus, these questions are needed so that we can accurately evaluate the economic health, well-being, and future characteristics of the labor force. Elimination of the Decennial Census topics would impair our ability to understand the sample measures that are routinely collected in both the current Population Survey of the Census Bureau and the Establishment Survey of the Bureau of Labor Statistics.

The removal of information on certain aspects of the trip to work, including the method of transportation used, the number of vehicles owned and the time of the trip, would seriously reduce the ability of the U.S. Department of Transportation to understand the patterns of traffic flow and transportation demand. For example, from 1960 to 1980, transportation patterns were calculated at the city block level. With the reduced data collection proposed for 1990, details on the trip to work will not be available, eliminating the possibility of analyzing small area transportation patterns associated with the distribution of over $15 billion in transportation support each year.

Thus, soley on the basis of the needs of individual federal agencies, I would suggest that there is sufficient justification for most, if not all, of the questions that have been recommended by the Inter-Agency Council and the experts at the U.S. Bureau of Census.

As a supplemental point I would also indicate to you that public decision-making at the state and local level would be seriously impaired by eliminating this vital information. The next witnesses will testify to that topic. I also know from experience in the private sector that many marketing, planning, and investment decisions of U.S. businesses would be less effective without of such information. While it is not possible to estimate the social costs resulting from poor or inadequate information--e.g. the impact on our national economy caused by inefficient private-sector investment decisions--it is clear that misappropriation of investment funds would impair our nation's ability to effectively compete in the international marketplace. To illustrate the significance of Census information on public decision-making, I am enclosing two items in an appendix. The first is a letter cosigned by a number of private firms involved in the analysis and dissemination of Census information. The second letter is from The Dun & Bradstreet Corporation and it presents an additional perspective on this important issue.

Conclusion

In this brief statement, I have made two basic points. The policy process for evaluating the nation's information needs has been distorted by OMB's decision about the Census. This proposal by the OMB to eliminate useful information is not in the nation's interest. Second, public decision-making at the state and local level and private decision-making will be harmed by the elimination of significant and useful detail from the Decennial Census.

I fully support the objectives of the Paperwork Reduction Act of 1980. However, as one who has long worked to maintain and enhance the quality and usefulness of federal statistical data, I would assert that OMB's recommendations put us at risk of "throwing out the baby with the bath water." Achieving marginal reductions in data collection is not, in my opinion, sensible justification for impairing our ability to make good decisions.

Donnelley
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DB a company of
The Dun & Bradstreet Corporation

Kenneth Hodges, Ph.D.
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August 5, 1987

Ms. Wendy Gramm, Administrator
Office of Information & Regulatory Affairs
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Ms. Gramm:

We at Donnelley Marketing are alarmed by the massive cuts recommended by OMB for the 1990 census questionnaire. The proposed cuts are so sweeping as to significantly diminish the scope of the census, and impair our knowledge of the U.S. population. While Donnelley Marketing and other private firms produce original and valuable demographic data, the private sector cannot be looked to as an alternative to the decennial census. The census is a unique and irreplaceable source of quality information, and its diminution benefits no one.

We object most strenuously to the sudden nature of the proposed cuts. In the past few years, the Bureau of the Census has worked closely with data users to develop an appropriate content for the 1990 questionnaire. OMB's proposal not only appears hasty and ill-considered, but circumvents important input from the data user community.

Changes in the content of the 1990 questionnaire may be warranted, but such changes must be (and we thought had been) carefully considered and subject to input from interested parties. The census is a critically important national resource, and since it is taken only once a decade, the missed opportunity costs are severe. We therefore strongly recommend that OMB's current proposal be shelved in favor of a more deliberate approach.

Sincerely,

Kenneth R. Hodges

Kenneth R. Hodges

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August 6, 1987

Mr. James C. Miller, Director
Office of Management & Budget
Old Executive Office Building
Washington, DC 20503

Mr. Donald Arbuckle
Office of Management & Budget
New Executive Office Building, Room 3228
Washington, DC 20503

Dear Mr. Miller and Mr. Arbuckle:

As executives representing the six major demographic firms in the United States, we are writing to express our deep concern and strong opposition to the Office of Management and Budget proposal to significantly cut the content of the 1990 census questionnaires.

Our companies serve a combined clientele numbering in the hundreds of thousands that represent a broad cross-section of commercial establishments, government agencies and not-for- profit corporations. All of these organizations depend on census-based information products and services to make informed decisions about where to allocate resources to better serve their customers or constituents.

While private information companies can and will make many valuable contributions to our knowledge of consumer activities and preferences, the 1990 Census must serve as the centerpiece of consumer information over the coming decade. The OMB-proposed cuts in the content of the 1990 census seriously undermine the ability of the demographic-based sector of the information industry to meet the future demands of these public and private enterprises. The absence of a complete census will undercut the private sector's efforts to become more competitive in U.S. markets and more productive in the use of their capital. The savings claimed by OMB from a shortened census questionnaire pale by comparison to the inevitable costs and hardship incurred through the missallocation of resources intended to better serve consumers and taxpayers.

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Mr. James C. Miller
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Hundreds of thousands of American businesses depend on census information to help them make their everyday decisions on production, distribution, marketing, advertising, retailing and site location. All of the items which OMB has proposed to cut are essential to those decisions. The migration question, for instance, may appear too esoteric until one considers the broad implications for differences in the goods and services needed for a population consisting of new movers compared to those long-term residents in established neighborhoods. Housing census items such as market value, rent and quality provide considerable insight into how a business might assess a consumer's needs and ability to pay. The needs and desires of people who, for example, live in an expensive, single-family dwelling neighborhood are different from those in exclusive townhouses, and different altogether from renters.

Each subsequent decennial census has made significant contributions to private enterprise and the consumers they serve. It would be a tragic mistake to curtail the scope of the 1990 census and eliminate the only possible source of comprehensive information on topics vital to many thousands of organizations in both the public and private sector who can better serve the taxpayer and consumer in the next decade. We urge you to reconsider your proposal to eliminate these vital questions and restore the questionnaire to its original format.

Sincerely,

Kenneth R. Hodges

Kenneth R. Hodges

cc: Senator David Pryor
Senator Ted Stevens
Representative Mervyn Dymally

Senator **Sarbanes**. Before I go to the next person on the panel, let me simply say that I think you made a very constructive suggestion as to how this might be addressed now.

However you want to characterize it, whether in fact OMB was directing that those questions come out, or expressing serious doubts about them, or asking for justification of the alleged extra burden, or asserting that they weren't justified at the moment and therefore didn't meet the standard and were on their way out unless justification could be established, it has been done in a timeframe that I think is unreasonable in terms of response and public comment.

On the other hand, if the timeframe is extended, then you create problems at the other end in terms of when you can proceed to the dress rehearsal, and when the questionnaire is ready to use for the purpose of the 1990 census.

So you're being compressed from that direction, it seems. As I understand it, your way of responding to that problem is to use the questionnaire for the dress rehearsal as it was prepared by the Census Bureau and submitted to OMB—in other words, up to the moment of the July 24 meeting. That would enable you to look at the results, modify the questionnaire, if necessary, but avoid the situation in which questions have been eliminated after they've been carefully developed through the agency review process over a period of some 3 years. All of a sudden, they're all going to be dropped out. And, of course, then it's going to be very difficult, if not impossible, I assume, to put them back in if they're not included at the dress rehearsal stage.

Isn't that correct, as a matter of process?

Mr. **Duncan**. That's correct. The purpose of a pretest, or a dress rehearsal, is to make sure that we gain experience with the interaction among the questions as sometimes one question leads to a second question. And that can be evaluated.

The quality of the responses, which were apparently questioned by OMB, can also be evaluated on the basis of the results from the dress rehearsal.

Senator **Sarbanes**. If you go ahead with the dress rehearsal and don't have the question in, and subsequently seek to put in a question that was not included in the dress rehearsal, the obvious response is: If this question has not been tested at the dress rehearsal, how can we possibly put it into the questionnaire?

Isn't that correct?

Mr. **Duncan**. That's correct.

Senator **Sarbanes**. Ms. VanWingen, why don't we go to you next? If you could pull the microphone over to you.

STATEMENT OF RACHEL SENNER VanWINGEN, GOVERNMENT DOCUMENTS LIBRARIAN, GEORGETOWN UNIVERSITY, ON BEHALF OF THE AMERICAN LIBRARY ASSOCIATION

Ms. **VanWingen**. I, too, have prepared a statement, but I'll keep my remarks very brief.

Senator **Sarbanes**. We will include the full statement in the record. Thank you.

Ms. VanWingen. My name is Rachel Senner VanWingen. I'm the government documents librarian at Georgetown University, a Federal depository library. It is a privilege today to testify on behalf of the American Library Association, a nonprofit, educational organization of nearly 44,000 librarians, trustees, and other friends of libraries dedicated to the improvement of library and information services for the entire population.

Simply stated, our position is in support of the dress rehearsal questionnaire for the 1990 census as proposed by the Bureau of the Census, and in opposition to the deletion or even the relegation to the long form of any questions at this late date.

The proper target for concerns about the census has always been the Census Bureau. The Office of Management and Budget has never solicited library input on the content of the census, nor has the library community addressed their concerns on it to OMB.

Yet OMB has put itself in the position of overriding the consultative process and professional expertise of the Census Bureau of denying them permission to produce the dress rehearsal questionnaire as proposed.

In the 3 days I've had to prepare my testimony, many colleagues have spoken to me citing examples of census use in their libraries. I would like to offer these examples as evidence of the immeasurable value that we place on the decennial census.

The government documents room of Georgetown University last yera received 22,000 inquiries and circulated 30,000 documents. Although our statistics do not reflect specific use, our experience shows that the second highest category of use after congressional publications is the census.

To demonstrate the range of census questions we handled, this week alone, we assisted a faculty member in the area of immigration policy, working on a grant, who needed household income by race for detailed georgraphic level—data only available from the decennial census.

And we assisted a business wanting to market their product in the metropolitan areas with the largest population in certain specific professions. They were willing to settle for 1980 data because they valued the level of detail provided by the census more than the currency of the data.

Other uses that immediately come to mind in our university setting are by the top administrators for planning using all manner of census statistics, by an economics professor using travel time to work data and by a business student using disability data.

As a matter of fact, the economics professor complained that the 1980 census eliminated the distance to work question, thereby making it very difficult to use the sophisticated economic models he needs in his analyses.

Every year, the senior nursing students at Georgetown must complete a community assessment project which involves analyzing detailed housing and social and economic characteristics not available elsewhere.

The head of the government publications department at the University of Kentucky offered examples of uses from her region of the specific questions targeted by OMB for elimination or downgrading.

The fertility question is used by local school districts, utilities, retail businesses and by road maintenance and garbage collection planners.

Automobile ownership is used by retail stores and by transportation departments in planning both road maintenance and bus routes. The number of rooms and appliances is used by retail businesses, utilities and local builders.

Residence of 5 years ago and travel to work are questions used by local planners of all kinds of services, retail businesses, economic development agencies and road maintenance administrators.

The Indiana State Data Center, in addition to answering numerous queries from the business community, provides census assistance to government agencies at all levels. These agencies use especially housing and labor force data.

Another category of user is the community group requiring census data in order to write applications for grants.

Without the collection of detailed data comparable to previous censuses, assessment of programs cannot take place. OMB's arbitrary decision to curtail the 1990 census questionnaire could affect the shape of research and policy analysis for the next 15 years, or until we have collected and have the results of the census of the year 2000.

Wise policy decisions are difficult to make in the face of uncertainty; they're impossible to make in the dark. There's no reason to be in the dark. The Bureau of the Census exists with a mandate to collect statistics in the national interest.

The mechanism is in place whereby the dress rehearsal questionnaire is tested, followed by the full-sale decennial census of 1990. Public policy questions which need solutions exist now, and more will emerge as we approach the 21st century.

This is our last chance to collect the data upon which those decisions will be based.

Thank you.

Senator SARBANES. Thank you very much. Very, very strong and thoughtful statement.

[The prepared statement of Ms. VanWingen follows:]

PREPARED STATEMENT OF RACHEL SENNER VanWINGEN

My name is Rachel Senner VanWingen. I am the Government Documents Librarian at Georgetown University. As a federal depository library, we are open to the public and serve, in addition to our own academic community, the wider community or researchers, consultants, entrepreneurs, lawyers, business people, health care workers, and other citizens.

It is a privilege today to testify on behalf of the American Library Association, a nonprofit, educational organization of nearly 44,000 librarians, trustees and other friends of libraries dedicated to the improvement of library and information services for the entire population. I have been a member of the Government Documents Round Table since 1972, and currently I chair its Statistical Measurement Committee. I have also served since 1984 as a member of the National Data Collection and Use Committee of the Library Administration and Management Association, a division of ALA.

Simply stated, our position is in support of the Dress Rehearsal Questionnaire for the 1990 Census as proposed by the Bureau of the Census and in opposition to the deletion, or even the relegation to the long form, of any questions at this late date.

The decennial census is a planned undertaking. As far as the library community is concerned, the planning for the 1990 Census was thorough, professional and fair. The Bureau held public hearings on subject content and products. Input from librarians and library users was solicited, and Census staff members appeared at ALA conferences to keep us apprised of the planning stages.

The result of this consultation and information gathering, modified by the professional expertise of the demographers and statisticians at the Census Bureau, is the Dress Rehearsal Questionnaire. This represents the best judgment of the Bureau to fulfill their mandate.

The proper target for concerns about the census has always been the Census Bureau. The Office of Management and Budget has never solicited library input on the content of the census, nor has the library community addressed their concerns on it to OMB. Yet OMB has put itself in the position of overriding the consultative process and professional expertise of the Census Bureau by denying them permission to produce the Dress Rehearsal Questionnaire as proposed.

In the three days I have had to prepare my testimony, many colleagues have spoken to me citing examples of census use in their libraries. As a representative of libraries and their users, I would like to offer these examples as evidence of the immeasurable value that we place on decennial data.

The Government Documents Room of Georgetown University last year received 22,234 inquiries and circulated 30,532 documents. Although our statistics do not reflect specific use, our experience shows that the second highest category of use, after congressional publications, is the census. To demonstrate the range of census questions we handle, this week alone we assisted:

o a faculty member in the area of immigration policy, working on a grant, who needed household income by race for detailed geographic level---data only available from the decennial census.

- a business wanting to market their product in the metropolitan areas with the largest populations in certain specific professions. They were willing to settle for 1980 data because they valued the level of detail provided by the Census more than the currency of the data.

Other uses that immediately come to mind in our university setting are by the top administrators for planning using all manner of census statistics, by an economics professor using travel time to work data, and by a business student using disability data. As a matter of fact, the economics professor complained that the 1980 Census eliminated the distance-to-work question, thereby making it very difficult to use the sophisticated economic models he needs in his analyses. Every year the Senior nursing students at Georgetown must complete a community assessment project which involves analyzing detailed housing and social and economic characteristics not available elsewhere.

In addition, our census data is used by a health policy unit, by outside lawyers, consultants, and by entrepreneurs and small businesses whose success the United States government has traditionally encouraged, realizing that healthy, small businesses are an asset to our economy.

The head of the Government Publications Department at the University of Kentucky, offered examples of uses from her region of the specific questions targeted by OMB for elimination or downgrading:

- The fertility question is used by local school districts, utilities, retail businesses, and by road maintenance and garbage collection planners.
- Automobile ownership is used by retail stores and by transportation departments in planning both road maintenance and bus routes.

- The number of rooms and appliances is used by retail businesses, utilities, and local builders.
- Residence of five years ago and travel to work are questions used by local planners of all kinds of services, retail businesses, economic development agencies, and road maintenance administrators.

The Indiana State Data Center, in addition to answering numerous queries from the business community, provides census assistance to government agencies at all levels. These agencies use especially housing and labor-force data. Another category of user is the community group requiring census data in order to write applications for grants. In 1986 this State Data Center, whose business is exclusively census data, received 4,791 inquiries.

The important points I want to make with these examples are:

- The level of geographic detail as well as the subject content in the decennial census is unique---not available elsewhere. That is why new publications continue to appear citing 1980 census data--because that is all that is available.
- the evidence very clearly demonstrates that census data is used for important public purposes.

The decennial census is unique in several other aspects: it is the only device that allows analysis of information about the population in the context of characteristics on the quality of life as measured by detailed income and housing statistics. For some data, the census questions represent a significant time series which should not arbitrarily be destroyed. Removing questions from the short form to the long form would destroy their comparability with past censuses and would introduce loss of reliability at the smaller geographic levels.

Census data is important not just to library users but to the society at large who may never have looked at its numbers or even know what it represents. We are all affected by the decisions that our governments at the local, state, and national level make based on census data. Quality of data is essential and content of data collection becomes critical.

Some of the issues on which data will not be collected in 1990, if OMB gets its way are:

Residential water sources

Energy sources

Automobile ownership

Property values

Mobility

Fertility

Employment and unemployment

Commuting

Researchers come to the library to find data necessary for their investigations. When they discover the data does not exist, they find they must change their projects to suit the data that does exist. Analysts need data to evaluate the programs of the '80s. The concept of accountability in government must include the ability to look back and evaluate the changes. Without the collection of detailed data comparable to previous censuses that assessment cannot take place. OMB's arbitrary decision to curtail the 1990 census questionnaire could affect the shape of research and policy analysis for the next 15 years or until we have collected and have the results of the census of the year 2000.

Wise policy decisions are difficult to make in the face of uncertainty. They are impossible to make in the dark. There is no reason to be in the dark. The Bureau of the Census exists with a mandate to collect statistics in the national interest. The mechanism is in place whereby the Dress Rehearsal Questionnaire is tested, followed by the full scale decennial census of 1990. Public policy questions which need solutions exist now and more will emerge as we approach the 21st century. This is our last chance to collect the data upon which those decisions will be based.

The American Library Association considers the work of the Census Bureau to be so critical to society as a whole that ALA Council, its governing body, passed a resolution supporting the issuance of a commemorative postage stamp in 1990 to honor the bicentennial of the United States Census. A copy of the resolution is attached to my testimony, and we request that it be made part of the record.

Thank you for this opportunity to present the views of the American Library Association.

ATTACHMENT

ATTACHMENT

Resolution Relating to Commemorative Census Stamp

WHEREAS, 1990 will be the 200th anniversary of the first United States Census of Population; and

WHEREAS, Census data has a profound effect on the economic, social and governmental activities of the entire nation; and

WHEREAS, Census data is an important resource used by all types of libraries; and

WHEREAS, The United States Census Bureau has worked closely with the library community in meeting the statistical needs of library patrons; and

WHEREAS, The American Library Association believes that the bicentennial of the Census is an appropriate subject for a commemorative United States postage stamp; now, therefore, be it

RESOLVED, That the American Library Association support the issuance of a commemorative postage stamp in 1990 to honor the bicentennial of the United States Census; and, be it further

RESOLVED, That the American Library Association communicate this support to the Postmaster General of the United States and the Chairperson of the Citizen's Stamp Advisory Committee of the United States Postal Service.

Adopted by the Council of the
American Library Association
San Francisco, California
July 1, 1987
(Council Document #64)

Senator SARBANES. Mr. Carliner, please proceed.

STATEMENT OF MICHAEL S. CARLINER, STAFF VICE PRESIDENT FOR ECONOMICS AND HOUSING POLICY, NATIONAL ASSOCIATION OF HOME BUILDERS

Mr. CARLINER. Thank you, Mr. Chairman. My name is Michael Carliner. I'm staff vice president for economics and housing policy at the National Association of Home Builders, an organization comprised of 147,000 firms involved in homebuilding and related industries.

I appreciate the opportunity to comment on the possible elimination from the 1990 census of a number of housing and population items of major importance to the housing industry, to local and State governments and to the effective formulation and administration of Federal housing policy.

Before getting into specific use of census data, I'd like to comment on the process that was discussed during Ms. Gramm's testimony.

Like Congressman Dymally, I received a copy of the Census Bureau's statement, which I understand was written by the Census Bureau. Attached to that as Attachment A is a document that I understand was distributed by OMB to the Census Bureau on July 24.

It takes the questions in the census and divides them into three categories. No. 1, 100 percent form. No. 2, long form. And, No 3, delete from 100 percent and long form.

I think that the way that that process was described by Ms. Gramm was somewhat at variance with what this suggests.

The items slated for elimination generally fall into four categories from the standpoint of housing interest: measures of affordability, measures of housing adequacy; measures of infrastructure demands; and measures of mobility, migration, and commuting.

Several population questions concerning labor force and fertility that were designated for elimination fall outside these categories but have indirect implications for housing.

The 1982 report of the President's Commission on Housing identified affordability of housing as today's primary lower income housing problem, but the OMB proposal would eliminate all measures of affordability from the census, including rent, value and the cost of utilities, fuels, insurance and mortgage payments.

In order to efficiently and equitably allocate resources, Federal programs of rental assistance and FHA mortgage insurance depend on rents, house prices and home ownership costs.

Measures of affordability also figure prominently in efforts by State and local governments to respond to housing needs. Builders use the affordability measures in assessing demand for additional housing, and through their free market efforts help to keep the cost of housing in line.

Measures of housing adequacy—such as heating equipment and number of bedrooms—tell about the other two dimensions of housing need: physical condition and overcrowding.

Heating equipment or the lack of it is an important indication of physical condition. Number of bedrooms is a measure of available space and overcrowding.

As I will discuss in a moment, OMB has already acted to eliminate more extensive measures of adequacy that were considered for the 1990 census.

Under HUD program rules, a household cannot receive rental assistance benefits if they do not have enough bedrooms, or if their home is physically inadequate. For example, if it lacks heat.

Approximately half of the households chosen under the HUD voucher and section VIII certificate programs who do not already occupy acceptable housing are unable to find housing that meets these standards; and they are, therefore, denied benefits.

The adequacy data indicate the availability of housing that meets the quality and bedroom standards. The availability of such housing is, in turn, a key to the feasibility in local areas of housing vouchers or similar programs.

Adequacy measures are also valuable to private firms attempting to determine the needs of the local marketplace. Construction of needed rather than unneeded housing is clearly of concern not only to the homebuilding industry, but to society in general.

The measures of infrastructure demands—sources of water, connection to public sewer, space and water heating fuels and the commuting items—are vital for the planning of facilities by local governments and public utilities.

It is through local government decisions regarding land use and the construction of infrastructure, and through local government housing policies and programs, that census housing data have the greatest impact on the broad spectrum of American households, as well as on the housing industry.

Measures of infrastructure demands are also used by a variety of Federal agencies concerned with health, safety and energy needs.

The measures of migration, mobility and commuting—year moved in, residence 5 years ago, the commuting mode and time—provide a basis for projecting future housing demand and choosing the optimal location for housing and business facilities.

Knowledge of migration patterns made it possible, for example, to anticipate the recent reduction in migration to Arizona as a result of improvement in Midwestern economies.

The year moved in measure indicates turnover and, in turn, demand for mortgages, new housing and other goods and services.

In conjunction with the affordability measures, the year moved in makes it possible to measure the cost of housing for new residents, based on housing that is actually available in the marketplace.

Besides the obvious value of the commuting data for transportation facilities planning, such data are used to bring people and businesses closer together by locating new jobs near the people, and vice versa.

The latest set of deletions proposed by OMB represent a continuation of a succession of administration actions to reduce the housing coverage in the 1990 census. The Census Bureau and HUD have been conducting research to determine ways to better measure the presence of substandard housing. In the April 1987 North

Dakota content test, several experimental questions were incorporated to detect substandard housing.

Normally, after such a content test, there is a retest to determine the accuracy of the information. After the North Dakota test was run, it is my understanding that OMB vetoed research to determine the success of that effort, effectively eliminating new quality measures to the 1990 census.

Two extremely valuable surveys have been conducted in conjunction with each decentennial census for several decades. One, the Components of Inventory Change, measures removals from the housing stock and conversions of structures from nonresidential to residential, et cetera.

The other, the Survey of Residential Finance, determines the type and source of financing used by homebuyers and the ownership and financing of rental housing.

OMB eliminated funds to prepare for these two surveys from the Census Bureau budget.

I urge this committee and the Congress to work toward restoration of the items proposed for deletion by OMB on July 24, and the housing quality items removed earlier.

In addition, the components of inventory change and survey of residential finance projects should be restored. Important public and private decisions about housing and public facilities lie ahead. We would be foolish to face those decisions blindfolded.

Senator SARBANES. Thank you very much, sir.

[The prepared statement of Mr. Carliner follows:]

PREPARED STATEMENT OF MICHAEL S. CARLINER

My name is Michael Carliner. I am Staff Vice President for Economics and Housing Policy at the National Association of Home Builders, an organization comprised of 147,000 firms involved in home building and related industries. I am also Vice Chairman of the Housing Statistics Users Group, which consists of individuals interested in facilitating the flow of information between governmental producers of data and interested users. The Housing Statistics Users Group includes people from the AFL-CIO, the American Planning Association, the Council of State Housing Agencies, the Housing Assistance Council, the Mortgage Bankers Association, the National Association of Housing and Redevelopment officials, the National Association of Home Builders, the National Association of Realtors, the National Council of Savings Institutions, the National League of Cities, and the Urban Institute.

I appreciate the opportunity to comment on the possible elimination from the 1990 Census of a number of housing and population items of major importance to the housing industry, to local and state governments, and to effective formulation and administration of Federal housing policy.

The items slated for elimination in this latest round of Census cutbacks generally fall into four categories from the standpoint of housing interest: measures of affordability; measures of housing adequacy; measures of infrastructure demands; and measures of mobility, migration, and transportation. Several of the specific Census questions serve as measures in two or more of those categories. Several "population" questions concerning labor force and fertility that are designated for elimination fall outside those categories, but have indirect implications for housing.

The 1982 Report of the President´s Commission on Housing identified affordability of housing as "today´s primary lower-income housing problem." Yet the OMB proposal would eliminate all affordability measures from the Census, including rent, value, and the cost of utilities, fuels, insurance and mortgage payments. In order to efficiently and equitably allocate resources, federal programs of rental assistance and FHA mortgage insurance depend on rents, house prices, and/or homeownership costs.

Measure of affordability also figure prominently in efforts by state and local government to respond to housing needs. Builders use the affordability measures in assessing the demand for additional housing, and through their free market efforts help to keep housing cost in line.

Measures of housing adequacy (heating equipment, number of bedrooms) measure another dimension of housing need. As the Report of the President´s Commission noted, "the quality of the housing stock has been measured along two dimensions: available space and physical condition." Heating equipment (or the lack of it) is an important indication of phytsical condition. Number of bedrooms is a measure of available space and overcrowding. As I will discuss in a moment, OMB has already acted to eliminate more extensive measures of adequacy that were considered for the 1990 Census.

Under HUD program rules, a household cannot receive rental assistance benefits if they do not have enough bedrooms or if their home is physically inadequate (e.g., it lacks heating). Approximately half of the households chosen under the HUD voucher and section 8 certificate programs who do not already occupy acceptable housing are unable to find housing that meets the standards, and they are therefore denied benefits. The adequacy data indicate the availability of housing that meets the quality and bedroom standards. The availability of such housing is in turn a key to the feasibility in local areas of housing vouchers and similar programs. Adequacy measures are also valuable to private firms attempting to determine the needs in the local marketplace. The construction of needed rather than unneeded housing is clearly of concern to society, not just to the individual builder.

The measures of infrastructure demands--source of water, connection to public space sewer, space heating and water heating fuels, and the commuting items--are vital for the planning of facilities by local governments and public utilities. It is through local government decisions regarding land use and the construction of infrastructure, and through local government housing policies and programs, that Census housing data have the greatest impact on the broad spectrum of American households, as well as on the housing industry. Measures of infrastructure demands are also widely used by federal agencies, including the Environmental Protection Agency, the Department of Agriculture, the Consumer Products Safety Commission, the Department of Health and Human Services, and the Department of Energy. OMB proposes to eliminate everything but the presence of "complete plumbing" and a telephone.

The measures of migration, mobility, and commuting (year moved in, residence 5 years ago, commuting mode and time) provide a basis for projecting future housing demand and choosing optimal locations for housing and business facilities. Knowledge of migration patterns made it possible, for example, to anticipate the recent reduction in migration to Arizona as a result of improvement in Midwestern economies. The "year moved in" measure indicates turnover and, in turn, demand for mortgages, new housing, and other goods and services. In conjunction with the affordability measures, the year moved in measure indicates the cost of housing for new residents, based on housing that is actually available in the marketplace.

Besides the obvious value of the commuting data for transportation facilities planning, such data are used to bring people and businesses closer together by locating new jobs opportunities near the people, and vice versa.

The latest set of deletions proposed by OMB represents a continuation of a succession of Administration actions to reduce the housing coverage in the 1990 Census. Two valuable items that were included in the 1980 Census, number of bathrooms and air conditioning, were previously deleted. The number of bathrooms may not sound important, but research has shown that statistic to be one of the best Census measures of quality in terms of explaining housing cost. Thus, through use of that measure, it becomes possible to distinguish areas where prices are high because the typical house is relatively elaborate from areas where even a relatively spartan home is expensive. The latter type of area is clearly more properly the focus of concern about affordability. Moreover, absence of any bathroom is an indication of more severly substandard housing than lack of complete plumbing, since complete plumbing is defined to include hot water. The air conditioning measure also has value as a measure of quality, but is especially important in planning peak load generating and distribution facilities for electric utlities.

The Census Bureau has been conducting research to determine ways to better measure the presence of substandard housing. In the April, 1987 North Dakota content test, several experimental questions were incorporated to detect substandard housing. After the North Dakota test was run, OMB vetoed research to determine the success of that effort, effectively eliminating new quality measures from the 1990 Census.

Two extremely valuable surveys have been conducted as follow-ups to each Decennial Census for several decades. One, the Components of Inventory Change, measures removals from the housing stock and conversions of structures from nonresidential to residential, etc. The other, the Survey of Residential Finance, determines the type and source of financing used by homeowners and the ownership and financing of rental housing. OMB eliminated funds to prepare for those two surveys from the Census Bureau budget.

I urge this Committee and the Congress to work toward restoration of the items proposed for deletion by OMB on July 24, as well as the bathroom, air conditioning, and housing quality items removed earlier. In addition, the Components of Inventory Change and Survey of Residential Finance projects should be restored. Important public and private decisions about housing and public facilities lie ahead. It would be foolish to face those decisions blind-folded.

Senator **Sarbanes**. Mr. Schechter, please proceed.

STATEMENT OF HENRY B. SCHECHTER, DIRECTOR, OFFICE OF HOUSING AND MONETARY POLICY, AFL-CIO

Mr. **Schechter**. I would also like to present my prepared statement for the record.

Senator **Sarbanes**. It will be included in the record.

Mr. **Schechter**. I came here under the supposition that the OMB had recommended deleting a number of questions, and I still would stick to that supposition because——

Senator **Sarbanes**. Mr. Schechter, I think you had better pull the microphone up. Make that point again if you would.

Mr. **Schechter**. Yes. I came here with the supposition that OMB had recommended deleting a number of questions, and I remain firm in that belief because when OMB tells an agency that more justification is needed, I think it is a good sign that there is a good chance the questions are on the way out.

So whatever I say will be phrased in those terms.

The proposal to eliminate many items would be a throw-back to the "know nothings" of the previous century. OMB's attitude would seem to be that unemployment and homelessness will disappear if the census just doesn't provide enlightening information on the problems.

The historical economic development of the United States long ago made it evident that certain basic economic data should be collected once every 10 years.

The AFL-CIO has a very serious problem concerning the proposed deletion of questions that are fundamental to keeping track of unemployment in local areas.

It is my understanding that there would be deletion of questions which would have indicated whether a person did not work because he was on layoff, whether he had been looking for work in recent years and when he last worked and at what occupation and in which industry. There would not be decennial census benchmark data to show the total number unemployed or the total work force.

In the past, the decennial census provided benchmark data for the country as a whole, for States, counties, cities, and small subdivisions. The decennial census data thus provided the benchmarks for unemployment relationships between larger areas and smaller areas that are needed to provide unemployment rates obtained through monthly sample surveys, which by themselves are not sufficient to establish monthly unemployment rates for the smaller areas.

For example, while the monthly sample data for Michigan are sufficient to establish a monthly unemployment rate for the State, the sample survey data by themselves are insufficient to provide a monthly unemployment rate for the city of Detroit.

However, by also using the decennial census relationship between unemployment in Michigan and in Detroit as well as the number of unemployment insurance claimants, an unemployment rate for Detroit is derived.

There are government programs that depend on unemployment rate data to determine eligibility of individual jurisdictions for procurement. For example, procurement contracts may be set aside for employers in labor surplus areas pursuant to Public Law 95-89 of August 4, 1977 and Public Law 96-302 of July 2, 1980.

The acts authorizing the Federal agencies to set aside contracts under labor surplus areas programs require that a civil jurisdiction has to be classified—would be classified as a surplus area, labor surplus area, when its unemployment rate had been 20 percent above the average unemployment rate for all States during the previous 2 calendar years.

There are thousands of these small areas that are designated as labor surplus areas. The Department of Labor publishes a book containing all the names every month.

Under the development action grant program, the Secretary of HUD, in determining the level of economic stress of cities and urban counties for purposes of eligibility for grants, has to take into account, among other things, the extent of unemployment, job lag, and surplus labor in the locality.

In the 1960's and 1970's, when antirecession public works programs were enacted, civil jurisdictions had to have unemployment rates above some designated standard in order to be eligible.

There would also be no record collected in 1990 of the past work and skills of the unemployed. Consequently, there would be no basis to plan for filling vacancies requiring the same skills elsewhere or for retraining people who had worked in a contracting occupation.

It would seem to be unthinkable to turn back the clock, to stop collecting the decennial census benchmark data on unemployment which are so essential for determination of monthly unemployment rates in thousands of civil jurisdictions.

Significant deletions of housing data questions also would be made from the 1990 census if the wishes of OMB prevail. In order for implementation of housing policies and programs to carry forward efficiently, the national housing goal of a decent home for every family, it is essential that information about the physical condition of the housing stock, additions and removals, and the affordability and occupancy of that stock by households with different composition and income levels be collected at reasonable intervals.

Furthermore, since housing is generally immobile, the information has to be collected for towns, cities, and metropolitan areas.

Among the things that would be eliminated from the question schedule in 1990 would be much of the guiding intelligence that is needed by the Congress for formulation of housing policies and programs targeted to meet needs which cannot be met by unassisted market forces. It would also handicap private developers in planning their production to coincide with effective market demand.

Information items proposed for elimination from the 1990 census include the value of the home or monthly rent; shelter costs, including utilities; the number of bedrooms; and housing quality.

Without such information, how can the public official or the private developer in a market area have a benchmark to judge the quality of the existing housing stock and the match or mismatch of family sizes with number of bedrooms?

And, in addition to the lack of knowledge about such physical characteristics, the economic market dimensions would be lacking in the absence of information on market value and shelter costs or rents.

Even if some private developers were to attempt to conduct surveys to obtain such information, it would entail a great expense for one developer, which would be passed on in the housing prices or rents, and the degree of accuracy would be far less than that achieved by the Census Bureau.

Other knowledge blackouts would be the trends in such matters as types of heating equipment and fuels being used, creating greater lags and cost between changes in demand for certain equipment and matching adjustment in production capacity.

Another gap in information needed for local transportation planning would be created by eliminating information on the means of commuting to work.

Today there are still many people at the lower rungs of the economic ladder who are living in substandard housing, including minorities, some of the elderly, handicapped, female-headed households, and others. It would be unfair to them to stop looking at housing conditions and needs at this time.

We know that the number of homeless individuals and families has visibly increased and is estimated to number in the hundreds of thousands or millions. We know that the number of families living doubled up with friends or relatives doubled from 1.4 million in 1976 to 2.8 million in 1986.

But we don't know the severity of these problems in different communities. A 1990 benchmark of available housing at given costs or rents in localities would help to fill in the gaps through judicial use of funds appropriated by the Congress.

There is also a decline in demand for single family homes as prices have risen, and a realistic count of what is available in local markets at given prices for homes of different sizes would help builders to identify the gaps and fill them in.

In the absence of such knowledge, unsold housing inventories will rise and construction employment will decline.

In economic activities, ignorance is not bliss. It adds to risk, which adds to costs that ultimately are paid directly by private consumers or indirectly through public agencies. Knowledge as to housing market conditions, shelter costs, and family shelter needs will hold down these risks and costs.

The absence of such knowledge would mark a tragic retreat of the U.S. society into darkness as far as housing is concerned.

In order that wholly private and publicly assisted housing construction, involving large sums of money, should not have to proceed at high risk, the Congress should enact legislation that authorizes a full population and housing census in 1990.

Senator **Sarbanes**. Thank you very much, sir, and I thank again all the members of the panel.

[The prepared statement of Mr. Schechter follows:]

PREPARED STATEMENT OF HENRY B. SCHECHTER

I appreciate the opportunity to present before you the views of the AFL-CIO on the proposed curtailment of data to be collected in the 1990 Census.

The proposal by the Office of Management and Budget to cut back on the 1990 Census is a throwback to the "Know Nothings" of the previous century. OMB's attitude is that unemployment and homelessness will disappear, if the Census just doesn't provide enlightening information on these problems. Instead of getting statistics as to the parameters of the unemployment, job loss, and job dislocation problems, the OMB just wants to wish away the problems -- as if ignorance were bliss. Housing questions that have long been part of the census would be dropped, instead of probed in the face of growing shortages of housing for low- and moderate-income families and individuals.

The historical economic development of the United States long ago made it evident that certain basic economic data should be collected once every ten years to measure and evaluate national progress in such things as employment and housing. As the economy became more complex, it was also important to take a count of changes in employment and population in the various political jurisdictions and economic markets of the country. There were also laws enacted which required such data for the administration of certain government programs. Much of the most useful data dealing with employment and housing would be eliminated from the 1990 Census in accordance with the position that has been taken by the Office of Management and Budget in ruling that a number of questions should be deleted from the 1990 Census schedule.

The AFL-CIO has a very serious concern with the proposed deletion of questions that are fundamental to keeping track of unemployment in local areas. It is my understanding that there would be deletion of questions which would indicate whether a person did not work last week because he was on layoff, whether he had been looking for work in recent weeks, and when he last worked and at what occupation and in which industry. There would not be decennial census benchmark data to show the total number unemployed or the total work force.

In the past, the decennial census provided such centennial benchmark data for the country as a whole, for states, counties, cities, and smaller subdivisions. The decennial census data thus provided the benchmarks for employment and unemployment relationships between larger areas and smaller areas for unemployment rates obtained through monthly sample surveys, which, by themselves, are not sufficient to establish monthly unemployment rates for the smaller areas. For example, while the monthly sample data for Michigan are sufficient to establish a monthly unemployment rate for that state, the sample survey data, by themselves, are insufficient to provide a monthly unemployment rate for the city of Detroit. However, by also using the decennial census relationship between unemployment in Michigan and Detroit as well as the number of unemployment insurance claimants, an unemployment rate for Detroit is derived.

There are government programs that depend on unemployment rate data to determine the eligibility of individual jurisdictions for benefits. For example, during the Korean War, the Office of Defense Mobilization directed procurement contracts to employers in labor surplus areas. That was later modified and made statutory by P.L. 95-89 of August 4, 1977, though still temporary. Then P.L. 96-302 on July 2, 1980, authorized the labor surplus program on a permanent basis. The act authorized federal agencies to set aside contracts under labor surplus area programs. A civilian jurisdiction was classified as a labor surplus area when its unemployment rate had been at least 20 percent above the average unemployment rate for all states during the previous two calendar years.

Under the Urban Development Action Grant program, the Secretary of HUD in determining the level of economic stress of cities and urban counties, for purposes of eligibility for grants, has to take into account, among other things, the extent of unemployment, job lag, or surplus labor in the locality. In the 1960s and 1970s, when anti-recession public works programs were enacted, civilian jurisdictions had to have unemployment rates above some designated standard in order to be eligible.

In addition to the types of statistical standards mentioned, federal, state, and local governments have used information as to the incidence of unemployment to guide them in efforts to counteract economic decline which is apt to spread from one jurisdiction to another.

In recent years, there have been instances where transportation was arranged to help persons in heavy unemployment jurisdictions to obtain jobs and commute to them in nearby jurisdictions with low unemployment rates. This happened most recently in the provision of transportation from Washington, D. C., to outlying suburbs. It happened about two years ago when the late Congressman Stewart McKinney arranged for bus transportation from the high unemployment city of Bridgeport, Connecticut, to the affluent city of Stanford, Connecticut, to provide jobs for a few hundred people. Both cities are in the congressional district which Congressman McKinney represented.

There would also be no record collected of the past work and skills of the unemployed. Consequently, there would be no basis to plan for filling vacancies requiring the same skills elsewhere or for retraining people who had worked in a contracting occupation.

It would be unthinkable to turn back the clock, to stop collecting the decennial census benchmark data on employment which are so essential for determination of monthly unemployment rates in thousands of civilian jurisdictions.

Significant deletions of housing data questions also would be made from the 1990 Census if the wishes of the Office of Management and Budget prevail.

Pursuant to the constitutional authority to provide for the general welfare, a national housing goal for the realization as soon as feasible of "a decent home and a suitable living environment for every American family" was enacted into federal law in 1949. As a matter of humane consideration for the less fortunate citizens of the country, and in order to maintain our status as a leading nation in the world, a program is needed to achieve that goal.

In order for housing policies and programs to carry forward the achievement of the national housing goal efficiently, it is essential that information about the physical condition of the housing stock, additions and removals, and the affordability and occupancy of that stock by households of different composition and income levels be collected at reasonable intervals. Furthermore, since housing is generally immobile, the information has to be collected for towns, cities, and metropolitan areas.

Basic information has been collected and published every ten years as part of the decennial census of population and housing. The Office of Management and Budget is now attempting to rule out the collection in the 1990 Census of significant housing data. It would eliminate much of the guiding intelligence that is needed by the Congress for the formulation of housing policies and programs targeted to meet needs which cannot be met by unassisted market forces. It would also handicap private developers in planning their production to coincide with the effective market demand.

The complete elimination of certain data that are vital to judge relative scarcity of units for a household of given size, composition, and income level would significantly increase the ignorance level of private developers and public officials concerned with the provision of housing and housing components. Information items proposed for elimination from the 1990 Census include the value of the home or monthly rent; shelter costs, including utilities; the number of bedrooms; and housing quality. Without such information, how can the public official or the private developer in a market area have a benchmark to judge the quality of the existing housing stock, and the match or mismatch of family sizes with the number of bedrooms? And, in addition to the lack of knowledge [illegible] such physical characteristics, the economic market dimensions would be lacking in the absence of information on market value and shelter costs or rent.

Even if some private developers were to attempt to conduct surveys to obtain such information, it would entail a great expense for one developer, which would be passed on in the housing prices or rents, and the degree of accuracy would be far less than that achieved by the Census Bureau.

Other knowledge blackouts would hide the trends in such matters as types of heating equipment and fuels being used, creating greater lags and costs between changes in demand for certain equipment and matching adjustment in production capacity. Another gap in information needed for local transportation planning would be created by eliminating information on means of commuting to work, which would in many instances delay the introduction of more efficient, timesaving means of commutation.

During most of the post-World War II years, progress was made toward provision of improved housing both in quality and quantity. A good deal of this improvement came about during the 1970s, based in part, in response to goals for a decade of unassisted and assisted housing production that were enacted in 1968. Those goals were based largely on an analysis of needs, derived mostly from census housing data, and an analysis of available physical resources to produce the housing which was based on other government data. Housing program legislation to support production toward meeting the goals was also enacted.

Today, there are still many people at the lower rungs of the economic ladder who are living in substandard housing, including minorities, some of the elderly, handicapped, female-headed households and others. It would be unfair to them to stop looking at housing conditions and needs at this time.

We know that the number of homeless individuals and families has visibly increased and is estimated to number in the hundreds of thousands or millions. We know that the number of families living doubled up with friends or relatives doubled from 1.4 million in 1976 to 2.8 million in 1986. But we don't know in which communities the problem is most severe. A 1990 benchmark of available housing at given costs or rents in localities would help to fill in the gaps through judicial use of funds appropriated by the Congress.

There is also a decline in demand for single-family homes as prices have risen and a realistic count of what is available in local markets at given prices for homes of different sizes would help builders to identify the gaps and fill them in. In the absence of such knowledge, unsold housing inventories will rise and construction employment will decline. A further decline in residential construction would produce a strategic drag on total economic activity.

In economic activities, ignorance is not bliss. It adds to risk, which adds to costs that ultimately are paid directly by private consumers or indirectly through public agencies. Knowledge as to housing market conditions, shelter costs, and family shelter needs will hold down those risks and costs.

The absence of such knowledge would mark a tragic retreat of the U.S. society into darkness as far as housing is concerned. The intended data elimination would be like drawing black curtains so that ignorance of substandard housing conditions for the poor could serve as the excuse for doing nothing about them.

In order that wholly private and publicly assisted housing construction, involving large sums of money, should not have to proceed at high risk -- and, therefore, high cost for all concerned -- and that a curtain of ignorance should not hide substandard living conditions, the Congress should enact legislation that authorizes a full population and housing census in 1990.

Senator **Sarbanes**. I will be very brief. First of all, let me make this observation.

It is an irony that as we are coming up to the bicentennial year of the census—the first one was in 1790, in the very early years of the Republic—we are fighting to save a reasonable census, rather than treating the bicentennial as a major opportunity in terms of strengthening both the quality and the impact of the census.

I am concerned about the process as much as I am about the substance. You have some questions that weren't included in the questionnaire that the Census Bureau prepared and you feel should have been included, and you make your case for that.

I think the point is reasonable that everyone wants to get questions in, although as I noted earlier, the length of the questionnaire that the Census Bureau came up with was approximately the length of the previous questionnaire. They did not, as it were, open up the flood gates in such a way as to require drastic pruning by OMB.

We have also done some calculations, and while they represent approximations, it is our estimate that eliminating the items questioned by OMB would save perhaps 4 percent of the cost of the census while losing about 30 percent of the information of the census. So there is an enormous loss of information compared to a small saving of cost.

Ms. VanWingen, I thought you put it very well in your statement when you said:

"As far as the library community is concerned the planning for the 1990 census was thorough, professional, and fair. The Census Bureau held public hearings on subject content and products. Inputs from librarians and library users were solicited, and the Census Bureau staff members appeared at American Library Association conferences to keep us apprised of the planning stage."

That is a very careful process, and it has been worked out over 3 years. You have had pretesting. The questionnaire has gone through stages of evolution, and now I think literally at the last minute, all of a sudden, a very significant portion of the questionnaire is at risk.

In fact, the timeframe is now so tight that, as Mr. Duncan pointed out, you can't really address it reasonably in this timeframe. I mean, on the 24th of July OMB raised these questions.

By the admission of Ms. Gramm this morning, they are going to have to print the questionnaire at the latest by the end of September in order to do the dress rehearsal in March.

Do you know of a question that has been put into the final questionnaire without first having been in the dress rehearsal?

Mr. **Duncan**. I am not aware of any, sir.

Senator **Sarbanes**. Do any of you know of such a question?

The process is always that you use the dress rehearsal to weed out questionnaires. It's hard to bring questions back in. They have not been subjected to the dress rehearsal.

Isn't that correct?

Mr. **Duncan**. Could I comment for a moment on the question of justification in terms of the process?

If in fact there is an issue about the reason behind any question that the Census Bureau has submitted, there is more than a file drawer of information behind each topic developed during the process that went on in both public hearings and in the Interagency Council.

The deficiency, it seems to me, is a technical one. Apparently, the Census Bureau did not submit with the form evidence of that justification, but the justification exists, as Janet Norwood noted. If they want more detail about how the Census Bureau, or how the Bureau of Labor Statistics, is going to use the employment information, that is readily available.

Senator **SARBANES**. Let me ask this question. One of the themes in Ms. Gramm's testimony, which has surfaced previously in reviewing national statistical programs, was the notion that this data can be obtained from private sources, that the Government ought not to be collecting this data and if the Government doesn't do it, private sources will move in and develop it.

Now, if you were here for the last question I put to her, a year ago, little more than a year ago, she even took the position that the census itself possibly should be shifted to a voluntary basis. I gather from her testimony this morning she now appreciates that just could not be done.

But what about this assertion that there are private sources that will provide this information and if you drop out these questions the information will come from somewhere else?

First, will it come from somewhere else, and even it it does, how accurate will it be?

Mr. **DUNCAN**. I will be happy to comment, Mr. Chairman.

The Dun & Bradstreet Corp. is in the business of collecting information and developing information for decisionmaking, both public and private, and we do collect a lot of information. Our experience is that businesses and households are generally cooperative in providing input to us.

But when you have the responsibility for determining representation under the constitution for local areas, I, frankly, would not suggest to the management of our company that we take on the responsibility for computing the population of small areas.

The mandatory nature of the census, while still resulting in some undercount, at least has the degree of credibility and acceptability that is necessary. Any private resource, whether it is the telephone company with its name and address listings, or the Post Office, or any other resource, is not going to be viewed as credible and is not going to be able to do as good a job as the Census Bureau does.

I think the idea that the private sector will somehow do this is a fallacious idea.

Second, if you did it purely in the private sector, the normal market response or question would be, what is it people want and how much are they willing to pay for it?

There is an awful lot of information in the census that develops over time. At the time it is being collected the full implications of it aren't fully known. The energy question is a good example of that.

The next time we have an oil shock and we don't have information about energy sources, once again as we were in 1974, we are going to have to face the fact that we don't understand what is going on.

There is a certain social responsibility, that I call the public benefit character of data, to anticipate future social issues. The private sector, quite frankly, is not going to do that because the private sector is interested in selling the results. They will sell what people demand today, not what they might demand tomorrow.

Senator SARBANES. Mr. Schechter.

Mr. SCHECHTER. There is also an institutional investment in the Census Bureau. You have people who spend a lifetime working there. The knowledge gets passed on from one to the other. They develop new methods, new techniques. They use the new computers as they come on board.

There is a history there and an ongoing institutional memory which no private institution would have, and it would cost a great deal more money than having the Census Bureau do it.

Senator SARBANES. Right.

Did you want to address that?

Mr. CARLINER. I just wanted to really echo what Mr. Duncan said. I used to be in the private information business, too. I don't think anyone in that business would come in and argue that they would prefer not to have the Census Bureau run so they could take over the business.

It is a completely different type of process, and nobody would want to make that substitution.

Senator SARBANES. Actually, you use the census as a base for doing your private business, don't you? What the census collects then becomes the base from which the private sector can refine and develop it; is that not the case?

Mr. CARLINER. Absolutely.

But one other point I want to make about that is that a lot of these data are used for comparing one local area with another, and where a private firm sometimes can collect a national number or collect it for a local area, there is nothing else to compare one area to another, and this has implications for things like the benefits for people in rental assistance programs in terms of determining fair market rents. You need something that is completely comparable from one area to another, and only a national census can do that.

Mr. SCHECHTER. Only with the decennial census do we get a real benchmark as to the size of the labor force and the means for continuing to measure labor, unemployment in the areas. No private organization really would have a market for that.

I mean, it's something that the Government needs if we're to have any sort of policy toward full employment. It's a product for the Government; nobody else would produce it.

Senator SARBANES. Ms. VanWingen.

Ms. VANWINGEN. If the private sector were collecting the statistical data, problems such as people living below the poverty line, disabilities, and the elderly would probably disappear because they would not be counted. Those are not constituencies that would be able to pay for their information collection.

Senator SARBANES. I think that's a very perceptive point.

Well, I want to thank the panel. You've been very helpful and we appreciate your patience in staying with us through a long morning. We appreciate it. Thank you very much.

We now call the public sector panel.

We're very pleased to have this panel. It's composed of Councilwoman Ruth Keeton, of Howard County, MD, an old and dear friend and someone I know, from my own personal knowledge, is one of the most effective and committed public officials in the Nation. She'll be speaking for the National Association of Counties; Michael Jackson, Councilman from the city of Alexandria, right here across the river, representing the National League of Cities; and Richard Chudd, the chief transportation coordinator of the city of New York.

We're very pleased to have you. I apologize you've had to wait so long, but it has been obvious to you the reason for that.

And, Ruth, why don't we start with your testimony, please.

STATEMENT OF HON. RUTH KEETON, COUNCIL MEMBER, HOWARD COUNTY, MD, ON BEHALF OF THE NATIONAL ASSOCIATION OF COUNTIES

Ms. KEETON. Thank you. I would like to comment first that it has been very good to have your opening statement before us, too, and that it has been an interesting day in terms of testimony. And I've appreciated your committee and your own questioning as the hearing has gone along.

I'm happy to speak today for the National Association of Counties, and I serve there as chair of the NACo Housing Subcommittee. I'm a member of the Howard County Council, as you have stated, and have worked now for 12 years on learning how we can work cooperatively with the Federal Government and its resources, as well as with county and State resources to meet the need of our people in our county.

I thank this committee for calling this timely hearing to examine the proposals recently released by the Office of Management and Budget. Their plan to arouse for consideration, delete entirely or transfer from the 100 percent survey to the sample component of the 1990 decennial census data on housing, transportation, unemployment, and energy would result in devastating consequences for local governments across the country.

And I think it's important that we look at the impact, not only at the Federal level, but also at local government level.

The Howard County government has sent a letter already to the Bureau of the Census regarding these OMB proposals which would significantly reduce the reliability and availability of census data if implemented or as eliminating issues.

These data are critical to county officials for planning and resource allocation and for implementing policies which address the need for housing, community facilities, social services and transportation.

And eliminating data, Mr. Chairman, as you well know, does not eradicate the need.

The decennial census, and I want to kind of focus on how we use it as local government and as other local governments do—so that the value of it as understood by all of us can be shared with you. The decennial census is viewed as the national standard because it collects data down to the smallest local unit. There is no alternative accurate source for much of the information collected in the decennial census.

Many rural counties, in particular, simply do not have resources to gather the data that OMB proposes or asks to be considered. Sampling is less reliable in rural counties than in more populous and homogenous city blocks. In the absence of a 100 percent survey, urban and as well as rural counties would have to rely more heavily on projections based on the 1960 and other decennial censuses—on windshield surveys conducted from cars, and door-to-door surveys.

Reliance on these techniques would affect uniformity in collecting data nationally. In addition, the loss of data in 1990, or the shifting of data to a sample survey, would break this continuity in data collection over time and make trend comparisons impossible or much more difficult in the future.

I want to focus on the impact on specific policy areas in the rest of this.

First, we take housing and community development. There were 31 questions asked for reconsideration by OMB. Nineteen of those address housing issues. Two were suggested to remain in the 100 percent one, and one in six of the questionnaires would last in the eight to a unit one.

Mr. Chairman, this nation is in the midst of a housing crisis. There's a fundamental need to develop a national housing policy which addresses issues impacting the affordability of housing. As from your participation on the Senate Housing Subcommittee, you must be well aware.

Policy cannot be created in a vacuum. It's essential that the decennial census contain data in the 100 percent survey which allows us to evaluate issues such as the ratio of income to shelter costs of our citizens, which factor into the housing crisis.

We need data not only on the amount of rent paid, but also housing costs associated with home ownership mortgages, utilities, taxes and insurance. This is among the data that is on the list of OMB's concerns.

The allocation of most Federal assistance for housing and community development is based on census data. For example, overcrowded housing is one of the factors which the Department of Housing and Urban Development, HUD, uses to allocate community development block grants to urban counties.

Data on the number of bedrooms and units is essential in order to measure overcrowding in rental housing. Similarly, HUD would not have data to set their market rents and calculate rental assistance payments needed to ensure that rents paid by low-income persons do not exceed the 30 percent of their income.

County governments rely upon census data to identify target areas for community development. Sample survey data would be insufficient to identify the pockets of poverty within counties; for example, where we—and I have Baltimore County, Maryland's testimony here:

In developing its comprehensive plan, they relied upon census data on plumbing, age of housing stock and other indices in determining that the Oella and Winterslane areas contain significant amounts of substandard housing that was suitable for rehabilitation.

Prince Georges County, MD, relies upon data from the 100 percent survey to assess the availability of water and sewer hookups in the county to implement the Maryland Indoor Plumbing Act.

Census data on number of rooms and size of units enable that county to determine the availability of units for households of different compositions.

Census data on congregate housing helps them, they feel. And Howard County and other local governments plan housing for senior and disabled citizens. Senior population is increasing in a number of our counties and we need to start now to look at reasonable shelter for them.

Mr. Chairman, we're witnessing the tragic and devastating results of the 70-percent reduction in Federal expenditures for housing and community development since 1980. County officials must have thorough census data so we can target the remaining Federal, State, and local resources to combat the crisis caused by homelessness and substandard housing.

So, all of these specific questions have heavy practical utility as it relates to housing.

Briefly, let me comment on energy, another area. OMB proposed or raised questions for additional justification about a block of questions on energy utilization, including how people heat their homes.

These are not only as important as housing questions, but are useful nationally in developing energy policy. Should we once again face an energy crisis, loss of this data would mean that the Federal Government would have to rely on 1980 data.

Let's go to transportation. There isn't a single county I know of in Maryland that doesn't have a long wish list on transportation. And the State of Maryland's housing staff had a real difficult problem in knowing how to extend their resources across the State.

The 100 percent survey of vehicles in a household is crucial for all types of transportation planning. This datum is the basic element in the construction of trip production models around the country. Planners advise that this datum is of such importance that they would have to compile it themselves if the Census Bureau did not collect it.

Time departure questions are also important. It enables local jurisdictions to develop programs which stagger work hours. This results in traffic patterns being spread more equitably over the rush hours. We're having rush hours, I can tell you, under great pressure in a number of our jurisdictions.

These types of campaigns are very difficult to undertake if the base data must be collected at the local level. The Montgomery County, MD, transportation director indicated that they had to spend a great deal of time getting this data from private companies who initially refused to participate.

Some of the housing questions which have been recommended for deletion affect transportation planning. For example, a good fix on the number of persons residing in a household, the number of persons traveling from that household and their hours of departure are just as important for highway planning as the number of households themselves.

The fertility rate question is of major importance in transportation planning. Population growth and demographic projections, which are used in forecasting plant sites and population patterns again affect highway planning.

These relevant transportation questions help planners design transportation systems that improve our high connectivity, reduce air pollution, incorporate local transit systems and coordinate plans with other jurisdictions.

And we value all of that information very much. Unemployment datum is vitally important to local governments, which receive funds under the Job Training Partnership Act and other State resources.

We frequently complain that many unemployed residents are unaccounted for and, consequently, are not factored into allocation determinations.

We feel that deletion of the questions on unemployment would further restrict the ability of local governments to identify the discouraged worker, those who are not drawing unemployment or who otherwise fall through the crack.

This is a sobering period for local government officials. We've witnessed the dramatic elimination of Federal funds to respond to Federal mandate. There's been a shift in responsibility from the Federal Government to state and local government, and the shift has occurred without a corresponding increase in funds.

Now we're faced with threatened elimination of data which allows us to identify and respond to the needs of our citizens. And we urge you to do all you can to keep that data available to us.

Senator **Sarbanes**. Thank you very much. I appreciate your statement.

[The prepared statement of Ms. Keeton, together with an attached letter, follows:]

PREPARED STATEMENT OF HON. RUTH KEETON

GOOD MORNING CHAIRMAN SARBANES AND MEMBERS OF THE JOINT ECONOMIC COMMITTEE. I AM RUTH KEETON, MEMBER OF THE HOWARD COUNTY, MARYLAND COUNCIL. I AM TESTIFYING TODAY ON BEHALF OF THE NATIONAL ASSOCIATION OF COUNTIES (NACo)*. I SERVE AS CHAIR OF THE NACo HOUSING SUBCOMMITTEE.

I THANK THE COMMITTEE FOR CALLING THIS TIMELY HEARING TO EXAMINE PROPOSALS RECENTLY RELEASED BY THE OFFICE OF MANAGEMENT AND BUDGET. THEIR PLAN TO DELETE ENTIRELY OR TRANSFER FROM THE 100 PERCENT SURVEY TO THE SAMPLE COMPONENT OF THE 1990 DECENNIAL CENSUS DATA ON HOUSING, TRANSPORTATION, UNEMPLOYMENT AND ENERGY WOULD RESULT IN DEVASTATING CONSEQUENCES FOR LOCAL GOVERNMENTS ACROSS THE COUNTRY.

THE HOWARD COUNTY COUNCIL HAS SENT A LETTER TO THE BUREAU OF THE CENSUS REGARDING THESE OMB PROPOSALS WHICH WOULD SIGNIFICANTLY REDUCE THE RELIABILITY AND AVAILABILITY OF CENSUS DATA. THIS DATA IS CRITICAL TO COUNTY OFFICIALS FOR PLANNING AND RESOURCE ALLOCATION AND FOR IMPLEMENTING POLICIES WHICH ADDRESS THE NEED FOR HOUSING, COMMUNITY FACILITIES, SOCIAL SERVICES AND TRANSPORTATION.

*THE NATIONAL ASSOCIATION OF COUNTIES IS THE ONLY NATIONAL ORGANIZATION REPRESENTING COUNTY GOVERNMENT IN THE UNITED STATES. THROUGH ITS MEMBERSHIP, URBAN, SUBURBAN AND RURAL COUNTIES JOIN TOGETHER TO BUILD EFFECTIVE, RESPONSIVE COUNTY GOVERNMENT. THE GOALS OF THE ORGANIZATION ARE TO: IMPROVE COUNTY GOVERNMENT; SERVE AS THE NATIONAL SPOKESMAN FOR COUNTY GOVERNMENT; TO ACT AS LIAISON BETWEEN THE NATION'S COUNTIES AND OTHER LEVELS OF GOVERNMENT; ACHIEVE PUBLIC UNDERSTANDING OF THE ROLE OF COUNTIES IN THE FEDERAL-AID SYSTEM.

MR. CHAIRMAN, ELIMINATING DATA DOES NOT ERADICATE THE NEED.

THE DECENNIAL CENSUS IS VIEWED AS THE NATIONAL STANDARD BECAUSE IT COLLECTS DATA DOWN TO THE SMALLEST LOCAL UNIT. THERE IS NO ALTERNATIVE ACCURATE SOURCE FOR MUCH OF THE INFORMATION COLLECTED IN THE DECENNIAL CENSUS. MANY RURAL COUNTIES, IN PARTICULAR, SIMPLY DO NOT HAVE RESOURCES TO GATHER THE DATA THAT OMB PROPOSES TO DELETE OR SHIFT TO THE SAMPLE SURVEY. SAMPLING IS LESS RELIABLE IN RURAL COUNTIES THAN IN MORE POPULOUS AND HOMOGENEOUS CITY BLOCKS. IN THE ABSENCE OF A 100 PERCENT SURVEY, URBAN AS WELL AS RURAL COUNTIES WOULD HAVE TO RELY MORE HEAVILY ON PROJECTIONS BASED ON THE 1960 AND OTHER DECENNIAL CENSUSES, ON WINDSHIELD SURVEYS CONDUCTED FROM CARS, AND DOOR-TO-DOOR SURVEYS. RELIANCE ON THESE TECHNIQUES WOULD AFFECT UNIFORMITY IN COLLECTING DATA NATIONALLY. IN ADDITION, THE LOSS OF DATA IN 1990 OR THE SHIFTING OF DATA TO A SAMPLE SURVEY WOULD BREAK THE CONTINUITY IN DATA COLLECTION OVER TIME AND MAKE TREND COMPARISON IMPOSSIBLE OR MUCH MORE DIFFICULT IN THE FUTURE.

IN MY REMAINING TESTIMONY I WILL FOCUS ON THE IMPACT OF OMB'S RECOMMENDATIONS ON SPECIFIC POLICY AREAS.

HOUSING AND COMMUNITY DEVELOPMENT

ROUGHLY TWO-THIRDS OF THE PROPOSED CUTS INVOLVE HOUSING DATA. QUESTIONS ON THE VALUE OF ONE'S HOME AND THE AMOUNT OF RENT PAID, WHICH THE CENSUS BUREAU RECOMMENDS FOR INCLUSION IN THE 100 PERCENT SURVEY, WOULD BE ELIMINATED ENTIRELY. EXCEPT FOR DATA ON THE NUMBER OF UNITS IN A STRUCTURE, HOUSING DATA WOULD BE CONTAINED IN THE SAMPLE SURVEY ONLY.

MR. CHAIRMAN, THIS NATION IS IN THE MIDST OF A HOUSING CRISIS. THERE IS A FUNDAMENTAL NEED TO DEVELOP A NATIONAL HOUSING POLICY WHICH ADDRESSES ISSUES IMPACTING THE AFFORDABILITY OF HOUSING. POLICY CANNOT BE CREATED IN A VACUUM. IT IS ESSENTIAL THAT THE DECENNIAL CENSUS CONTAIN DATA IN THE 100 PERCENT SURVEY WHICH ALLOWS US TO EVALUATE ISSUES SUCH AS THE RATIO OF INCOME TO SHELTER COST OF OUR CITIZENS WHICH FACTOR INTO THE HOUSING CRISIS. WE NEED DATA NOT ONLY ON THE AMOUNT OF RENT PAID, BUT ALSO HOUSING COSTS ASSOCIATED WITH HOMEOWNERSHIP LIKE MORTGAGES, UTILITIES, TAXES AND INSURANCE. THIS IS AMONG THE DATA ON OMB'S DELETION LIST.

THE ALLOCATION OF MOST FEDERAL ASSISTANCE FOR HOUSING AND COMMUNITY DEVELOPMENT IS BASED ON CENSUS DATA. FOR EXAMPLE, OVERCROWDED HOUSING IS ONE OF THE FACTORS WHICH THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) USES TO ALLOCATE COMMUNITY DEVELOPMENT BLOCK GRANTS (CDBG) TO URBAN COUNTIES. DATA ON THE NUMBER OF BEDROOMS IN UNITS IS ESSENTIAL IN ORDER TO MEASURE OVERCROWDING IN RENTAL HOUSING. YET, OMB WOULD DELETE THIS DATA FROM THE DECENNIAL CENSUS. SIMILARLY, HUD WOULD NOT HAVE DATA TO SET FAIR MARKET RENTS AND CALCULATE RENTAL ASSISTANCE PAYMENTS NEEDED TO ENSURE THAT RENTS PAID BY LOW INCOME PERSONS DO NOT EXCEED 30 PERCENT OF THEIR INCOME.

COUNTY GOVERNMENTS RELY UPON CENSUS DATA TO IDENTIFY TARGET AREAS FOR COMMUNITY DEVELOPMENT. SAMPLE SURVEY DATA WOULD BE INSUFFICIENT TO IDENTIFY POCKETS OF POVERTY WITHIN COUNTIES. FOR EXAMPLE, BALTIMORE COUNTY, MARYLAND, IN DEVELOPING ITS COMPREHENSIVE PLAN, RELIED UPON CENSUS DATA ON PLUMBING, AGE OF HOUSING STOCK AND OTHER INDICES IN DETERMINING THAT THE OELLA AND WINTERSLANE AREAS CONTAINED SIGNIFICANT AMOUNTS OF SUBSTANDARD HOUSING THAT WAS SUITABLE FOR REHABILITATION. PLANNING THIS YEAR FOR THE CDBG PROGRAM AGAIN RELIED ON INDICATORS OF SUBSTANDARD HOUSING, AND TURNER STATION AND LANSDOWNE WERE SELECTED AS TARGET COMMUNITIES. IN ADDITION, BALTIMORE COUNTY USES HOUSING DATA ON THESE TARGET AREAS TO ATTRACT PRIVATE DEVELOPMENT WHICH HAS GENERATED COMMERCIAL REVITALIZATION, HOUSING AND EMPLOYMENT.

PRINCE GEORGES COUNTY, MARYLAND RELIES UPON DATA FROM THE 100 PERCENT SURVEY TO ASSESS THE AVAILABILITY OF WATER AND SEWER HOOK-UPS IN THE COUNTY AND TO IMPLEMENT THE MARYLAND INDOOR PLUMBING ACT. CENSUS DATA ON NUMBER OF ROOMS AND SIZE OF UNITS ENABLES THE COUNTY TO DETERMINE THE AVAILABLE OF UNITS FOR HOUSEHOLDS OF DIFFERENT COMPOSITIONS. CENSUS DATA ON CONGREGATE HOUSING WOULD HELP PRINCE GEORGES COUNTY, HOWARD COUNTY AND OTHER LOCAL GOVERNMENTS PLAN HOUSING FOR SENIOR AND DISABLED CITIZENS.

MR. CHAIRMAN, WE ARE WITNESSING THE TRAGIC AND DEVASTATING RESULTS OF THE 70 PERCENT REDUCTION IN FEDERAL EXPENDITURES FOR HOUSING AND COMMUNITY DEVELOPMENT SINCE 1980. COUNTY OFFICIALS MUST HAVE THOROUGH CENSUS DATA SO THAT WE CAN TARGET REMAINING FEDERAL, STATE AND LOCAL RESOURCES TO COMBAT CRISES CAUSED BY HOMELESSNESS AND SUBSTANDARD HOUSING.

ENERGY

OMB PROPOSES TO ELIMINATE A BLOCK OF QUESTIONS ON ENERGY UTILIZATION, INCLUDING HOW PEOPLE HEAT THEIR HOMES. THESE ARE NOT ONLY IMPORTANT AS HOUSING QUESTIONS, BUT ARE USEFUL NATIONALLY IN DEVELOPING ENERGY POLICY. SHOULD WE ONCE AGAIN FACE AN ENERGY CRISIS, LOSS OF THIS DATA WOULD MEAN THAT THE FEDERAL GOVERNMENT WOULD HAVE TO RELY ON 1980 DATA. LOCAL

OFFICIALS FACING THE SAME CONSTRAINTS, WOULD HAVE FEWER RESOURCES TO ASSIST THE FEDERAL GOVERNMENT PLAN FOR AN ENERGY CRISIS. COUNTY GOVERNMENTS WOULD BE USING OLD DATA TO IDENTIFY CITIZENS WHO NEED TO MAKE ADJUSTMENTS TO A SHIFT IN ENERGY AVAILABILITY.

TRANSPORTATION

THE 100 PERCENT SURVEY OF VEHICLES IN A HOUSEHOLD IS CRUCIAL FOR ALL TYPES OF TRANSPORTATION PLANNING. THIS DATA IS THE BASIC ELEMENT IN THE CONSTRUCTION OF TRIP/PRODUCTION MODELS AROUND THE COUNTRY. PLANNERS ADVISE THAT THIS DATA IS OF SUCH IMPORTANCE THAT THEY WOULD HAVE TO COMPILE IT THEMSELVES IF CENSUS DID NOT COLLECT IT.

THE TIME DEPARTURE QUESTION IS ALSO IMPORTANT, BECAUSE IT ENABLES LOCAL JURISDICTIONS TO DEVELOP PROGRAMS WHICH STAGGER WORK HOURS. THIS RESULTS IN TRAFFIC PATTERNS BEING SPREAD MORE EQUITABLY OVER THE RUSH HOURS. THESE TYPES OF CAMPAIGNS ARE VERY DIFFICULT TO UNDERTAKE IF THE BASE DATA MUST BE COLLECTED AT THE LOCAL LEVEL. THE MONTGOMERY COUNTY, MARYLAND TRANSPORTATION DIRECTOR INDICATED THAT THEY HAD TO SPEND A GREAT DEAL OF TIME GETTING THIS DATA FROM PRIVATE COMPANIES WHO INITIALLY REFUSED TO PARTICIPATE.

SOME OF THE HOUSING QUESTIONS WHICH HAVE BEEN RECOMMENDED FOR DELETION AFFECT TRANSPORTATION PLANNING. FOR EXAMPLE, A GOOD FIX ON THE NUMBER OF PERSONS RESIDING IN A HOUSEHOLD, THE NUMBER OF PERSONS TRAVELING FROM THAT HOUSEHOLD, AND THEIR HOURS OF DEPARTURE ARE JUST AS IMPORTANT FOR HIGHWAY PLANNING AS THE NUMBER OF HOUSEHOLDS THEMSELVES.

THE FERTILITY RATE QUESTION IS OF MAJOR IMPORTANCE IN TRANSPORTATION PLANNING. POPULATION GROWTH AND DEMOGRAPHIC PROJECTIONS, WHICH ARE USED IN FORCASTING PLANT SITES AND POPULATION PATTERNS, AFFECT HIGHWAY PLANNING.

IT IS INTERESTING TO NOTE THAT OMB HAS NOT TOUCHED THE QUESTIONS REGARDING PLACE OF WORK SINCE THAT DATA IS NEEDED BY OMB TO ESTABLISH METROPOLITAN STATISTICAL AREAS. HOWEVER, THEY HAVE ELIMINATED THE QUESTIONS AS TO HOW ONE GETS THERE.

IN A MOBILE SOCIETY LIKE OURS, WE REALIZE THE IMPORTANCE OF THIS DATA IN PLANNING ROUTE ANALYSIS FOR PUBLIC TRANSIT SYSTEMS, TO FORCAST REGIONAL TRAVEL PATTERNS, AND FOR INTERCHANGE AND CORRIDOR STUDIES.

THESE RELEVANT TRANSPORTATION QUESTIONS HELP PLANNERS DESIGN TRANSPORTATION SYSTEMS THAT IMPROVE HIGH CONNECTIVITY, REDUCE AIR POLLUTION, INCORPORATE LOCAL TRANSIT SYSTEMS, AND COORDINATE PLANS WITH OTHER JURISDICTIONS. FOR COMPARISON PURPOSES, THERE IS NO OTHER DATA OF THIS TYPE AVAILABLE WHICH IS AS CONSISTENT, VERIFIABLE AND RELIABLE, AND WHICH COVERS THE ENTIRE NATION.

UNEMPLOYMENT

UNEMPLOYMENT DATA IS VITALLY IMPORTANT TO LOCAL GOVERNMENTS WHICH RECEIVE FUNDS UNDER THE JOB TRAINING PARTNERSHIP ACT. TWO-THIRDS OF JTPA FUNDS ARE ALLOCATED WITHIN THE STATES TO LOCAL AREAS ON THE BASIS OF UNEMPLOYMENT DATA.

COUNTY GOVERNMENTS FREQUENTLY COMPLAIN THAT MANY UNEMPLOYED RESIDENTS ARE UNACCOUNTED FOR, AND CONSEQUENTLY ARE NOT FACTORED INTO ALLOCATION DETERMINATIONS. WE FEEL THAT DELETION OF THE QUESTIONS ON UNEMPLOYMENT WOULD FURTHER RESTRICT THE ABILITY OF LOCAL GOVERNMENTS TO IDENTIFY THE DISCOURAGED WORKER, THOSE WHO ARE NOT DRAWING UNEMPLOYMENT OR WHO OTHERWISE FALL THROUGH THE CRACKS.

MR. CHAIRMAN, I HAVE SITED MANY LOCAL EXAMPLES OF HOW THIS DATA IS USEFUL TO COUNTY GOVERNMENTS. IT IS SAFE TO SAY THAT THESE USES OF DECENNIAL CENSUS DATA ARE REPLILCATED IN THE MAJORITY OF THE NATION'S 3,107 COUNTIES.

THIS IS A SOBERING PERIOD FOR LOCAL GOVERNMENT OFFICIALS. WE HAVE WITNESSED A DRAMATIC ELIMINATION OF FEDERAL FUNDS TO RESPOND TO FEDERAL MANDATES. THERE HAS BEEN A SHIFT IN RESPONSIBILITY FROM THE FEDERAL GOVERNMENT TO STATE AND LOCAL GOVERNMENTS. THIS SHIFT HAS OCCURRED WITHOUT A COMMENSORATE INCREASE IN FUNDS. NOW WE ARE FACED WITH THREATENED ELIMINATION OF DATA WHICH ALLOWS US TO IDENTIFY AND RESPOND TO THE NEEDS OF OUR CITIZENS.

MR. CHAIRMAN, WE MUST MAINTAIN THE INTEGRITY OF THE INTERGOVERNMENTAL PARTNERSHIP. COLLECTION OF CENSUS DATA IS A CORNERSTONE OF THAT PARTNERSHIP. THE HUMAN MISERY OF OUR CITIZENS IS ESCALATING. ELIMINATION OF THE DATA DOES NOT ERADICATE THE NEEDS, AND CERTAINLY DOES NOT RESOLVE THE CHALLENGES FACING THIS GREAT NATION.

OFFICE OF COUNTY EXECUTIVE

ELIZABETH BOBO
COUNTY EXECUTIVE

GEORGE HOWARD BUILDING
3430 COURT HOUSE DRIVE
ELLICOTT CITY, MARYLAND 21043
(301) 992-2001

August 4, 1987

Mrs. Wendy Gramm, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
726 Jackson Place, N.W.
Washington, D.C. 20503

Dear Ms. Gramm:

It is my understanding that the Census Bureau, in reviewing questions for use in the 1990 Census, is considering elimination of many housing and transportation-related questions that were included in the 1980 Census. Howard County has utilized the 1980 Census transportation data in traffic modeling, as well as transportation and land use planning. Questions relating to mode of transportation, travel time to work and vehicle occupancy are key elements in transportation modeling. Development of this data at the local or regional level would be very expensive and inefficient. In addition, cross tabulations with other census data would not be practical.

I would recommend that the housing and transportation questions remain in the 1990 Census and would appreciate an opportunity for further input prior to deletion of these questions.

Sincerely,

William E Eakle

William E. Eakle
Acting County Executive

WEE/JWR,JR./mjh

cc: Uri P. Avin, AICP
File
3712B

Senator SARBANES. Mr. Jackson, please proceed.

STATEMENT OF HON. MICHAEL JACKSON, COUNCIL MEMBER, ALEXANDRIA, VA, ON BEHALF OF THE NATIONAL LEAGUE OF CITIES

Mr. JACKSON. Thank you, sir. Good afternoon, Mr. Chairman. My name is Michael Jackson, and I'm a member of the Alexandria, VA, City Council. And I'm here today on behalf of the elected public officials of the 16,000 municipalities represented directly or indirectly by the National League of Cities.

I want to thank you, sir, for the prompt scheduling of this important hearing and for the efforts that you and Senator Bingaman and others have made to protect the vital census data for both public and private use over the next decade.

The committee staff has copies of my prepared statement for submission in the record, so I won't actually repeat that statement now. But, if I may, sir, I'd like to take a few minutes to briefly review some examples of how the proposed elimination of census data will adversely impact the city of Alexandria and other cities throughout the Nation.

First, in the area of housing, information on housing costs is critical because housing affordability is one of the key problems currently facing the city of Alexandria. Data on these costs are essential in assessing the affordability of housing in the city and the level of assistance needed in order to maintain an economically diverse community.

With the current decline in Federal funding for housing programs and the resulting need for the city to fund housing efforts from other sources, it is even more critical that we have the necessary data to assess the full nature and extent of the city's housing needs.

In addition, this information also serves as the basis for much of the Federal housing assistance provided to Alexandria—no different than what Ms. Keeton just testified to. A key element in the housing assistance plan is the number of lower income people paying more than 30 percent of their income for housing and, therefore, in need of housing assistance.

In the area of traffic and parking, without the proposed questions that ask about commuting habits, the city will be hampered in creating workable traffic and transportation plans.

The city needs to know the origin and the destination of commuters, their hours of travel and their means of travel. Data on the number of vehicles owned by each household was useful in the past in creating a parking policy for the old town section of our city. It is important that this information remain available, so that changes in the need for residential parking can be measured.

In the area of employment, question No. 21 relates to the number of hours a respondent actually works, and it's important in identifying segments of our city's population which may be underemployed.

Programs designed to help the underemployed could be developed, if needed. Also, the city's transportation program could be altered to provide better transport for the young and the elderly commuting to part-time work.

In the area of mobility, the questions relating to previous place of residence are important in tracing the change in the city's population. Growth of specific groups of the population which may have special needs can be gauged from the answers to these questions.

In conclusion, sir, there really is no other source of data available to our city or to cities across the Nation that is equal to that provided by the 10-year U.S. census.

The U.S. Census Bureau has a level of authority to ask questions and to elicit answers that cannot be equalled by any other surveyor, whether private or public. The resulting data also has the authority of coming from a reliable, independent, authoritative source and it is not subject to self-serving statistical manipulations.

Also, unlike most other data, the data from the U.S. census are comparable. Alexandria is able to compare census data on the city with information for other northern Virginia jurisdictions, jurisdictions in Maryland or the District of Columbia.

This could not be done with data that was gathered by the localities, or even data that might generate from the Commonwealth of Virginia.

In summary, in our view, Mr. Chairman, accurate information is one of the most critical factors to both the public and private sectors to make informed decisions. We very much hope this preliminary directive will be reconsidered.

Thank you, sir.

Senator SARBANES. Thank you, Mr. Jackson. Your prepared statement will, of course, be included in the record.

Mr. JACKSON. Thank you, sir.

[The prepared statement of Mr. Jackson follows:]

PREPARED STATEMENT OF HON. MICHAEL JACKSON

Good morning, Mr. Chairman. My name is Michael Jackson. I am a Councilmember from Alexandria, Virginia, here this morning on behalf of the public elected officials of the 16,000 municipalities represented directly and indirectly by the National League of Cities.

I want to thank you for the prompt scheduling of these important hearings and for the efforts you, Senator Bingaman and others have made to protect vital census data for both public and private use over the next decade.

We oppose the abrupt directive of the Office of Management and Budget to the Bureau of the Census to eliminate nearly half the proposed questions from the 1990 census forms.

The proposed action, if maintained, would eliminate some of the most vital statistical data available to the federal, state, and municipal governments to plan and implement critical housing, transportation, employment, and social services programs for at least a decade. It would be particularly harmful to the efforts of all levels of government attempting to target and respond to citizens' needs - especially those who are most vulnerable.

In our view, the proposal would pose special problems for local governments. As we have struggled to finance new responsibilities at the municipal level in a period of a declining federal partnership and significant changes in the federal tax code, we have increasingly relied on much of the census date proposed for deletion to determine our own budget, planning, and infrastructure investment priorities. Without the census data, trends in unemployment, housing, population shifts, transportation, and energy consumption would be nearly impossible to track. This would adversely impact both the ability of the federal government to target scarce resources, as well as the ability of municipal governments to work with the private sector.

For example, through census migration data, we have been able to determine that there has been nearly a 50 percent population turnover in Northern Virginia over the last 5 years. This turnover has radically changed the composition of the population in Alexandria and Arlington. There has been a significant in-migration of foreign-born and non-white persons; there has been a substantial outmigration of families.

These migration patterns have major implications for our school system, for our health care and social services delivery systems, for our training and employment programs, and for housing. The change means we have a significant change in the kinds of housing units in demand, as well as significantly altered transportation patterns and needs.

With a growing number of cities not just in this region, but throughout the nation hard at work developing plans for the year

2000 and beyond, the proposed elimination of these census questions and the potential loss of invaluable data would have the effect of blinding us in our most important capacity of serving the public.

Unless this abrupt decision is reversed, it will cripple our efforts to identify clearly and respond to the needs of our citizens - and to respond in a timely, efficient, and effective manner. It is difficult to imagine, Mr. Chairman, a more inexpensive investment with such long term benefits than the census data provides.

The elimination of data would, in many ways, confront us with a double jeopardy situation. On the one hand, we are facing increased federal requirements for information reporting - I would note especially the series of new provisions in the House proposed reauthorization of the Community Development Block Grant program; yet, the very data we would need to comply with some of these new federal requirements is now proposed for elimination.

But even without the federal requirements, declining federal investment means that we are all attempting to target scarcer resources to where they will accomplish the most. In Seattle, the City uses data to determine which tracts have concentrations of low-income youth, female-headed households, and senior citizens. The city uses the data in putting together its community development needs assessment in order to identify which neighborhoods need the greatest assistance and what kind.

In Alexandria, we are working with cities and towns throughout Virginia from census data to determine different types of low income housing needs in order to develop recommendations for state distribution formulas and a statewide housing trust fund. Having comparable data statewide is critical to this project, and to equity in the allocation of whatever resources.

The OMB Deletion Order & Process

The Census questions themselves were developed by the Census not only on the basis of experience from past census reports but also after an extensive content development and testing process. Yet the directive from OMB provided less than two weeks' notice.

While the Census Department made every effort to solicit and obtain public input in its process, we were never contacted, nor given any public opportunity to have input into the OMB decision-making process. Indeed, your hearing today provides the first opportunity municipal elected officials have had to hear the OMB justifications for thei hasty actions.

In summary, in our view, Mr. Chairman, accurate information is one of the most critical factors to both the public and private sector to make informed decisions. We very much hope this preliminary directive will be reconsidered.

Thank you.

Senator SARBANES. Mr. Chudd, please proceed.

STATEMENT OF RICHARD A. CHUDD, CHIEF TRANSPORTATION COORDINATOR, DEPARTMENT OF CITY PLANNING, NEW YORK CITY

Mr. CHUDD. Mr. Chairman, in the interest of time, I would like to summarize my prepared statement that I have submitted.

My name is Richard Chudd. I am the chief transportation coordinator for the New York City Department of City Planning. I also have the privilege of serving as the chairman of the Forecasting Working Group of the New York Metropolitan Transportation Council.

While the council serves New York City and five suburban counties in New York State, the Forecasting Working Group includes active members from planning and transportation agencies in New Jersey and Connecticut as well.

The members of this committee use data available from the decennial census to analyze and forecast population, housing, labor force, employment and journey-to-work travel.

The heart of good transportation planning is a good demographic and travel behavior information. The single most important source of these data is the census. It has been since 1960. There is simply no other source that combines demographic and travel-related data with the reliability and geographic level of detail as does the census.

To develop long-range demographic forecasts requires more than absolute numbers. It requires the analysis and understanding of the underlying characteristics that resulted in the change over the decade. We've had the ability to analyze journey-to-work travel in relation to various demographic characteristics since the 1960 census.

The proposal by OMB to eliminate key questions for the 1990 census related to migration, auto availability, mode of travel, vehicle occupancy and travel time to work will break this important trend analysis chain. Planners need a high degree of consistency and continuity in the census data collected decade to decade.

City planning has a comprehensive computer assignment model for New York's extensive bus and subway system, which is used for evaluating capital improvement alternatives and transit service changes.

For the third time, in the early 1990's, we plan to use mode-specific journey-to-work data from the census to update and refine our trip tables used in our computer models. If the mode of journey-to-work travel and other related questions are eliminated, this would be impossible.

In that event, transportation planning agencies would be forced to conduct costly and time-consuming home interview or less reliable questionnaire surveys. Due to the size of the New York tristate region, the cost would be prohibitive. Frankly, it is because of the high cost of these surveys, nearly two times the amount of Federal planning assistance received by the New York region annually, that we have not done a home interview survey since 1963, and relied instead on census journey-to-work information.

It is my understanding from discussions with my colleagues nationwide that most other metropolitan areas have done the same.

Transit and highway assignment models similar to the one we have at city planning in New York have been developed using Federal funding in major metropolitan areas throughout the country. They are used in capital project planning in New York and other cities to determine the most cost-effective expenditures of public monies—Federal, State, and local. This type of model is also used for transit service planning. In New York, we use it for evaluating proposed changes to subway and bus routes.

In conclusion, I want to express my deep dismay over the questions OMB proposes to eliminate from the 1988 census dress rehearsal and, hence, from the 1990 census. The elimination of this information will severely cripple transportation planning in the New York region and nationwide. It will make it very difficult for local governments to meet their transportation planning obligations under title XXIII, section 134. It will also hamper our ability to plan transportation facilities and services to ensure continued compliance with the Clean Air Act into the next century.

Local governments in the New York region and elsewhere cannot afford to collect this data themselves. The census is the best and most efficient way to maintain continuity of data.

The Census Bureau's proposed questionnaire for 1990 already incorporates many compromises based on meetings held nationwide. We, in the transportation planning community, need more data, not less. Our desire in today's fast-changing society would be to have the census conducted every 5 years instead of 10.

Mr. Chairman, I would like to submit for the record letters and supporting materials from seven planning agencies in the New York region compiled by the Regional Data Users' Network, requesting the reestablishment of the Census Bureau's original questionnaire.

These letters have been transmitted separately to OMB and the Census Bureau.

Thank you.

Senator **SARBANES**. Thank you very much, sir, and those letters will be included in the record.

[The prepared statement of Mr. Chudd, together with the letters referred to for the record, follows:]

PREPARED STATEMENT OF RICHARD A. CHUDD

Senator Sarbanes, members of the Joint Economic Committee, my name is Richard A. Chudd. I am the Chief Transportation Coordinator for the New York City Department of City Planning. I also have the privilege of serving as Chairman of the Forecasting Working Group of the New York Metropolitan Transportation Council. While the Council serves New York City and five suburban counties in New York State, the Forecasting Working Group includes active members from planning and transportation agencies in New Jersey and Connecticut, as well. The members of this Committee use data available from the decennial census to analyze and forecast population, housing, labor force, employment and journey-to-work travel.

The heart of good transportation planning is good demographic and travel behavior information. The single most important source of these data is the decennial census. It has been since 1960. There is simply no other source that combines demographic and travel-related data with the reliability and geographic level of detail as does the Census.

Part of a transportation planner's job is to forecast highway and transit travel demand for 20 to 30 years into the future. To do this requires more than journey-to-work travel information; it also requires reliable forecasts of population, housing, labor force and employment. The bases for these long-range forecasts are in large measure the decennial census data. To develop these demographic forecasts requires more than absolute numbers, it requires the analysis and understanding of the underlying characteristics that resulted in the change over the decade. We have had the ability to analyze journey-to-work travel in relationship to various demographic characteristics since the 1960 Census. The proposal by OMB to eliminate key questions for the 1990 Census related to migration, fertility rates, auto availability, mode of travel, vehicle occupancy and travel time to work will break this important trend analysis chain. Planners need a high degree of consistency and continuity in the census data collected decade to decade.

The best example of the importance of being able to cross-tabulate census travel data with census demographic data is the relationship between journey-to-work travel by automobile or public transit and household income and auto availability. OMB proposes to eliminate questions related to journey-to-work mode of travel and auto availability. To do so would hinder our ability to use this important trip generation relationship.

Mode choice for journey-to-work travel varies between origin and destination location pairs. It is therefore important to have mode of travel information on a small area basis that only the census provides. This data is very important to us in New York, especially to estimate the mode of travel to work places outside the Manhattan CBD, in the other boroughs and suburban counties. I will be leaving a copy of two of our recent reports, which illustrate our use of census data for local area transportation planning in New York City.

Data on labor force participation on a small area basis, which includes both employed and unemployed, are also essential for our transportation planning activities in New York. City Planning recently undertook a study funded by UMTA, to assess the future mass transportation needs for the 59 community districts comprising the City. Estimates of future ridership demand were generated using local labor force projections. These could not have been developed, if base data on both employment and unemployment for small areas had not been available from the 1980 decennial census. It is essential that similar tabulations of the unemployed be available from the 1990 census to continue our transportation planning activities at the community level.

City Planning in the mid-1970's developed a comprehensive computer assignment model for New York's extensive bus and subway system, which is used for evaluating capital improvement alternatives and transit service changes. The table of trip origin and destination pairs used by this computer model was derived from an extensive, regional home interview travel survey conducted in 1963. This survey which sampled only one percent of the region's households, would cost over ten million dollars to duplicate today. Mode-specific journey-to-work information from the 1970 Census was used to validate what was then 10-year old survey information. By the early 1980's, changes in regional travel patterns were extensive. Nevertheless, we were able to use mode-specific journey-to-work information from the 1980 Census to expand, adjust and refine our trip tables and sucessfully recalibrate our models.

We plan to use the journey-to-work data from the 1990 Census to update and refine our trip tables once again. If the mode of journey-to-work travel question is eliminated this would be impossible. In that event, transportation planning agencies would be forced to conduct costly and time consuming home interview or less reliable questionnaire surveys. Due to the size of the New York tri-state region, the cost would be prohibitive. Frankly, it is because of the high cost of these surveys -- nearly two times the amount of federal planning assistance received by New York region annually -- that we have not done another home interview survey and relied instead on census journey-to-work information. It is my understanding from discussions with my colleagues nationwide that most major metropolitan areas have done the same.

Transit and highway assignment models, similar to the one we have at City Planning in New York, have been developed using federal funding in major metropolitan areas throughout the country. They are used in capital project planning in New York and other cities to determine the most cost effective expenditures of public monies....federal, state and local. This type of model is also used for transit service planning. In New York, we use it for evaluating proposed changes to subway and bus routes.

In conclusion, I want to express my deep dismay over the questions OMB proposes to eliminate from the 1988 Census Dress Rehearsal and, hence, from the 1990 Census. The elimination of this information will severely cripple transportation planning in New York and nationwide. It will make it very difficult for local governments to meet their transportation planning obligations under Title 23, Section 134. It will also hamper our ability to plan transportation facilites and services to ensure continued compliance with the Clean Air Act into the next century. Local governments in New York and elsewhere cannot afford to collect this data ourselves. The Census is the best and most efficient way to maintain continuity of data. The Census Bureau's proposed questionnaire for 1990 already incorporates many compromises based on meetings held nationwide. We in the transportation planning community need more data, not less. Our desire in today's fast changing society would be have the Census conducted every five years instead of ten.

Thank you!

RDUN Regional Data Users' Network
2 Lafayette Street / Room 2107 / New York, N.Y. 10007 / (212) 566-0497

August 6, 1987

Honorable Paul S. Sarbanes
Chairman
Joint Economic Committee
G01
Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Sarbanes:

There was an outpouring of deep concern by members of the Regional Data Users' Network over the deletions to the 1990 Census Content proposed by the Office of Management and Budget. Many users had participated in working committees from 1983 through 1985 to seriously evaluate the need for specific census items and had expressed their recommendations to the Bureau of the Census at the regional public meeting on September 12, 1984 and in a considerable exchange of correspondence since then. We have been carefully following the process and result of the Bureau's National Content Tests, its recommendations to the Federal Agency Council and to the Census Advisory Committees. Despite some remaining differences related to the Bureau decisions to exclude some proposed subject matter, we believe that the 1988 Dress Rehearsal questionnaire has struck an excellent balance.

It is, therefore, with disbelief and dismay that our members learned of the illogical and capricious subject matter cuts made by the Office of Management and Budget. The deletions clearly reflected a profound lack of information on why the data are needed and how they are used during the post census decade by agencies throughout the country. This information was readily available to the staff of OMB, if they had taken the trouble to inquire. Also, they could have studied how the various questions are linked, and are interdependent. There should have been an appreciation of the importance of historical comparability, for example, the age and sex specific labor force participation rates.

Several member agencies have submitted letters to OMB protesting the deletions, documenting their reasons. They have asked me to assemble this correspondence and support evidence, and to submit it as a group to the Joint Economic Committee to be included as part of the testimony of its hearing on August 7. Accordingly, I have attached materials from the following agencies:

1. The Port Authority of New York and New Jersey (two letters)
2. New York Metropolitan Transportation Council (letter and sixteen attachments)
3. Long Island Regional Planning Board (two letters)
4. New York City Department of City Planning Individual letters from:
    - (a) Population Division (three attachments)
    - (b) Transporation Division
    - (c) Housing and Economic Planning Division
    - (d) Planning Management and Support Division of Community Facility and Capital Planning
5. New York City Housing and Preservation Department
6. New York City Department of Employment
7. New York City Metropolitan Transit Authority

We greatly appreciate the interest of the Joint Economic Committee on this issue and hope that this hearing will result in the reestablishment of the Bureau of the Census' original proposed questionnaire.

Sincerely,

Evelyn S Mann

Evelyn S. Mann
President

THE PORT AUTHORITY OF NY & NJ

One World Trade Center
New York, N.Y. 10048

(212) 466-7000
(201) 622-6600

August 4, 1987

Ms. Dorothy Tella
Office of Management and Budget
New Executive Office Building
726 Jackson Place N.W.
Washington, D.C. 20503

Dear Ms. Tella:

As the Assistant Director for Transportation Planning of the Port Authority's Planning and Development Department, I implore you to replace the transportation information to the 1990 Census questionnaire. The Port Authority of New York and New Jersey manages a vital portion of the transportation system of the New York-New Jersey Metropolitan region and our capital expenditure in the 1990s will be billions of dollars.

The heart of good transportation planning is good transportation information. The single most important source of these data is the decennial census. There is simply no other source that provides transportation data with the detailed data, reliability and geographic level of detail as does the Census. The journey-to-work information with modal detail and time-travelled statistics are invaluable tools for staff use in forecasting transportation and subsequently, transportation planning.

For these reasons, I urge you to reconsider your plan to eliminate transportation questions from the 1990 Census.

Sincerely,

Christine Johnson
Assistant Director

cc: Wendy Gramm
Donald Arbuckle

Writer's direct dial telephone (212) 432-4471

THE PORT AUTHORITY OF NY & NJ

One World Trade Center
New York, NY 10048

[illegible]
[illegible]

August 4, 1987

Ms. Dorothy Tella
Office of Management and Budget
New Executive Office Building
726 Jackson Place N.W.
Washington, D.C. 20503

Dear Ms. Tella:

As Chief Economist for the Port Authority of New York and New Jersey, I urge you to reconsider your plans for severe reductions in the 1990 Census questionnaire. This agency has a vital role in the transportation of the largest region in the nation and will have a capital program of billions of dollars in the 1990s.

In order to intelligently plan for this capital program, good transportation information and forecasts are essential. My staff uses the output of the decennial census to analyze and forecast labor force, employment and population. The elimination of the migration question would seriously hinder our ability to understand and forecast population trends. Similarly, the reduction of labor force information will result in an inability to analyze and forecast labor force. Without these vital components, good transportation planning and forecasting is impossible.

[illegible] (212) 432-4473

Also of great value to us are the housing and energy information contained in the Census. One of the biggest barriers to growth in this region is the cost of housing. The loss of this information would seriously handicap our knowledge of this problem.

For these reasons, please keep the 1990 Census form in its current form.

Sincerely,

for Rosemary Scanlon
Chief Economist/
Asst. Director

cc: Wendy Gramm
Donald Arbuckle

bcc: Evelyn Mann, NYC Planning Commission

NEW YORK METROPOLITAN TRANSPORTATION COUNCIL
ONE WORLD TRADE CENTER, SUITE 82E, NEW YORK, N.Y. 10048

August 5, 1987

Mrs. Wendy Gramm
Administrator
Office of Management and Budget
Office of Information and Regulatory Affairs
New Executive Office Building
17th Street between Pennsylvania Avenue & H Street N.W.
Washington, DC 20503

Dear Mrs. Gramm:

It has come to the attention of the New York Metropolitan Transportation Council that your agency has recommended that several transportation related questions be dropped from the 1990 Census long form questionnaire. The Council is an organization of elected officials and transportation agencies which guide the transportation planning process in the ten southern counties of New York State. The governor has designated the Council as the area's official Metropolitan Planning Organization (MPO), and we are the largest MPO in the nation.

As we understand, all questions except the place of work would be deleted from the Census questionnaire. This proposal is completely unacceptable and would severely handicap the Council in carrying out its federal mandates. By eliminating the question on means of transportation, the usefulness of work trip origin/destination tables for our multi-modal metropolitan area will be severely limited. Comprehensive service planning for our Council members, most of whom are transit operating agencies, will be impossible without the knowledge of the number and characteristics of workers using subway, bus, railroad, auto and other means of transportation. For example, the New York City Transit Authority will not be able to determine the impact of growth in employment centers such as the Manhattan Central Business District (CBD), downtown Brooklyn or Long Island City on the subway system, as well as whether changes of work place translate into changes of mode and usage. This information is essential in estimating manpower and equipment needs, and in analyzing the fare structure. For another member, the Port Authority of New York and New Jersey, an operator of airports, tunnels, bridges and a rail rapid transit line, the journey-to-work data are vital in planning its regional transportation and economic development activities.

Historically, since 1960 the Census has provided work place and mode choice data, which we have subsequently purchased. Since these data are collected uniformly on a national basis and used by MPOs across the nation, high levels of efficiency are achieved. Furthermore, these are the only data available on these subjects. The intention to eliminate this unique information from the 1990 Census would not be in the best national interest. Not only will it harm the transportation community, but also thousands of private businesses dependent on these data, especially in their marketing studies. Lack of this information will result in the worsening of transit service, higher levels of congestion on highways and less desirable locations for new businesses and housing.

The proposed question on starting and ending times of work is also important. Work travel must be related to peak travel hours if the data are to be of maximum utility. Furthermore, data on auto ownership, trip length and ridesharing are particularly useful in the transportation planning process.

To document the above statements we are attaching the following reports in which are listed many different uses of the UTPP by public agencies and private sector organizations for whom we processed the journey-to-work data:

1) Remarks to Subcommittee on Urban Transportation Data & Information Systems, Transportation Research Board, Washington DC, by Lawrence V. Hammel, NYMTC, January 16, 1984. Also published in Census Data and Urban Transportation Planning in the 1980s, Transportation Research Record 981, Transportation Research Board, Washington, D.C. 1984, pp. 109-110.

2) Non-Transportation Uses of the Urban Transportation Planning Package. For Presentation at National Conference on Decennial Census Data for Transportation Planning, December 9-12, 1984, Lake Buena Vista, FL, by Lawrence V. Hammel, PE, Assistant Staff Director, NYMTC. Also published in Proceedings of the National Conference on Decennial Census Data for Transportation Planning, Special Report 206. Transportation Research Board, Washington, D.C. 1985, pp. 74-79.

3) Statement on 1990 Census at New York City Public Meeting, September 12, 1984 by Lawrence V. Hammel, P.E., Assistant Staff Director.

4) Statement on 1990 Census Products, New York City Census Product Meeting, May 22, 1986 by Lawrence V. Hammel, P.E., Assistant Staff Director.

5) UTPP Data Development For Transit Operators
Includes: List of Services Provided: April 1, 1984 to October 31, 1984. Consulting firms utilizing UTPP material, private sector organizations using UTPP, and non-transportation agencies using UTPP material.

6) Two technical memoranda entitled "Support Provided to Transit Operators," from Lawrence V. Hammel, dated March 27, 1986 and from Kuo-Ann Chiao, dated March 31, 1987.

Also, we are enclosing some of our information compendia on the 1980 Census, pertaining to journey-to-work, which we prepared and distributed free of charge to our Council members and the general public.

In summary, we cannot overemphasize the importance of providing journey-to-work data, referred to as the Urban Transportation Planning Package (UTPP). The UTPP is the only available source of relevant and pertinent information on transportation related characteristics and of origin/destination information for the work trip. This unique data source cannot be replaced by other surveys and must not be eliminated from the 1990 Census. We trust that you will reconsider your recommendation. Thank you.

Sincerely,

Lawrence V. Hammel, P.E.
Assistant Staff Director

LVH/JB/eg

cc: Louis Rossi
Dorothy Tella
Donald Arbuckle
William R. Butz
Philip Salopek

bcc: Evelyn S. Mann
Sandra E. Hayes
Joana Brunso

Long Island Regional Planning Board

Edward Cook
Chairman
John J. Hart
Vice Chairman
Patrick F. Caputo
Paul J. Fitzpatrick
John Wickham
John W. Wydler
Lee E. Koppelman
Executive Director

H. Lee Dennison Executive Office Building
Veterans Memorial Highway, Hauppauge, L.I., N.Y. 11788
Area Code (516) 360-5189

August 4, 1987

Mr. Donald R. Arbuckle
Office of Management and Budget
NEOB
17th Street Between Pa. Ave. & H. St., N.W.
Washington, D. C. 20503

Dear Mr. Arbuckle:

I was dismayed to learn that the U. S. Office of Management and Budget plans to delete several labor force questions from the 1990 Census questionnaire. The decennial census is the only source of detailed labor force information for counties and their respective subdivisions. On Long Island, labor force information from the 1980 Census was used to document the need for day care facilities based on the family responsibilities of female labor force participants. The census also enabled us to pinpoint the volume of part-time employment, to ascertain the disability status of Nassau-Suffolk residents and to determine the place of work, educational attainment and occupational skills of Long island residents.

I understand that OMB plans to delete questions concerning those looking for work. This will make it impossible for us to define the total labor force or to develop small area unemployment data. Such small area data are particularly important in an area like Nassau-Suffolk, which is highly defense dependent and now faces defense cutbacks.

The enclosed study demonstrates the uses to which we have put 1980 Census labor force data. I cannot emphasize too strongly the need for complete labor force data from the forthcoming 1990 Census.

Sincerely,

Pearl M. Kamer

Pearl M. Kamer, Ph.D.
Chief Economist

PMK:pd
Encl.
Labor Force

cc: Wm. P. Butz, Census Bureau
Bob Scardamalia, NY State Commerce
Eveylyn Mann, City Plan. Comm.
& Jackson Heights resid.

Long Island Regional Planning Board

Edward Cook
Chairman
John J. Hart
Vice Chairman
Patrick F. Caputo
Paul J. Fitzpatrick.
John Wickham
John W. Wydler
Lee E. Koppelman
Executive Director

H. Lee Dennison Executive Office Building
Veterans Memorial Highway, Hauppauge, L.I., N.Y. 11788
Area Code (516) 360-5189

August 4, 1987

Mr. Donald R. Arbuckle
Office of Management and Budget
NEOB
17th Street Between Pa. Ave. & H. St., N.W.
Washington, D. C. 20503

Dear Mr. Arbuckle:

I have read with dismay the items that are to be dropped from the 1990 Census and urge you immediately to reconsider this terribly short-sighted move. Many of the census data items that are proposed for elimination or reduction to a sample are of great important to governmental units like ourselves and a large proportion of the public. We distribute large quantities of printed material and extracts from census tapes to this region. I am enclosing a couple of samples of some of the sources of data that would be adversely affected by your proposed action.

The housing characteristics reported rely on rent and value information to allow communities to develop housing policy and to comply with the remaining federal programs that all require extensive housing statistics. The elimination of items such as value, rent, heating equipment, costs of utilities, plus tax and mortgage costs, would make it extremely difficult to develop housing policies in the future. This area suffers from a severe lack of affordable housing because of the rapid increase of costs of all types of housing. We presently have estimates of housing value, but only the census provides clear documentation of the change and the small area data that is necessary for clear and concise analysis. Some categories such as public sewers, fuel used for heating water, and condominium fees are less important and can be identified from other sources. As far as samples go, items such as plumbing facilities, telephone, number of rooms and kitchen facilities are less important and can be covered adequately by a sample. However, the distinction between owner and renter is often very important and should be continued as a 100% item so that neighborhood data would still be available.

The second publication that is enclosed covers the topic of the journey to work. Right after housing problems, transportation is high on the list of items that must be addressed by local officials. This particular report which analyses census material in depth relied on very good journey to work data and results in travel patterns, concentrations of jobs, and a whole series of other items that are absolutely critical to making intelligent plan decisions. We have been working extensively on our data source since 1980 so that by 1990 it will be possible to produce an even better journey to work report. To eliminate some of the items would have a devastating effect on all the agencies that are involved.

I also want to sharply criticize the proposal to delete the population item "residences 5 years ago" and the housing item "number of automobiles". The first of these helps to establish migration patterns. This is especially important in an area like Long Island where we are seeing an aging population returning from the sunbelt. We must continue to document this data to project a need from the necessary health care and housing facilities. The second item gives you a critical number, the actual number of automobiles that are generated by each household. Virtually every planning study and environmental impact statement relies on such data to deal with our aforementioned traffic problem. We do extensive economic research and will provide additional documentation in this very important area to show you how the census information is used on a continuing basis in this region.

I hope you will give this letter serious consideration because the short term savings will be far outweighed by a loss of necessary data in the next decade.

Yours truly,

Arthur H. Kunz
Planning Coordinator

AHK:pd
Encls.
Pop 80
Journey to Work

cc: Wm. P. Butz, Census Bureau
Bob Scardamalia, NY State Commerce
Evelyn Mann, City Plan. Comm.
✓& Jackson Heights resid.

DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK
INFORMATION SERVICES

August 6, 1987

Ms. Wendy Lee Gramm, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
Old Executive Office Building
Washington, DC 20503

Dear Ms. Gramm:

This is to express our deep concern over the proposed deletion of selected subject matter from the 1990 Census questionnaire.

The Population Division of the Department of City Planning has the city-wide role of census coordination and, thus, also assumes major responsibility for the processing and dissemination of Census data for city agencies. As a primary consultant in New York City on the applications of demographic data, we are one of the largest users of Census data in the nation and are thoroughly familiar with the range of small-area census data applications in the public, quasi-public and private sectors. We also provide the analytic framework for planning and policy decisions; our published reports have been widely distributed.

Many in our data user community are submitting separate statements to you so as to permit fuller exposition of their subject matter concerns. This letter is confined to one subject item, "Place of residence in 1985."

Two Lafayette Street, New York, N.Y. 10007 - 1363, Room 2114, (212) 566-0550
Philip B. Wallick, *Assistant Executive Director*
Linda Goldsmith, *Deputy Director, Information Services*

In 1980, about 40 percent of New York City residents indicated that they lived in a" different house" in 1975. Over 1,070,000 persons left New York City between 1975 and 1980 for destinations in the 50 states and Puerto Rico and 666,000 persons entered the city in the same period, huge migration flows by any standard. An examination of the demographic and socio-economic characteristics of in and out migrants, as well as the size and duration of such flows, is of enormous importance to New York City. Our ability to track differences over time, specifically 1975-1980 compared with 1985-1990, is even more critical from a policy and planning perspective.

The Office of Management and Budget's proposal to drop "Place of Residence in 1985" from the 1990 Census questionnaire raises serious concerns because this item is the only direct source of information on local-level population movements. The projects in which the census migration data have been utilized, described below, illustrate just a few out of many applications.

1. Proposals for new housing construction in the central and south Bronx have made extensive use of migration data to examine potential markets for new housing developments. Households migrating into the borough and intra-borough movers represent potential markets. For each migration stream, detailed demographic and socioeconomic profiles have been examined. Table 1 from this study is enclosed for your review. There was no other available data source for this information.

2. A major point of concern to New York City is the changing composition of its population and how such shifts relate to in and out migration. Knowledge of who is coming in and who is leaving allows a city to better address the specific needs at various levels of its population. A paper was presented at the 1986 Population Association of America meetings addressing some of these issues. A copy is enclosed of "Outmigration Rates and Extra-regional Migration Propensity of Race and Hispanic Origin Groups, New York City, 1975-80," part of a ten-chapter monograph currently nearing completion.

3. Tabulations from the "Place of residence in 1975" question allowed for the construction of migration rates as input to population projections. Projections for the year 2000 for New York City's major governmental subareas (59 community districts) utilize age-and sex-specific migration rates which are based heavily on the 1975-1980 experience. A sample of such projections are enclosed.

Other research being undertaken relative to housing requirements examines whether households and families move intact (all persons therein moving as a unit) or not. By learning more about the dynamics of household and family movement, it is hoped that more effective intervention policies to discourage outmigration can be developed. Special studies are also being conducted on intra-metropolitan migration, migration to Puerto Rico and migration of the native black population.

Removal of the place of residence question from the 1990 questionaire would have a devastating effect on the ability to address the migration component of population change and the impact of migration on the composition of New York City as a whole as well as the composition of its subareas.

Sincerely,

Evelyn S Mann

Evelyn S. Mann
Director

Joseph J. Salvo

Joseph J. Salvo
Deputy Director

Attachments (3)

DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK

TRANSPORTATION DIVISION

August 5, 1987

Mr. Donald R. Arbuckle
Office of Management and Budget
New Executive Office Building
726 Jackson Place N.W.
Washington D.C. 20503

Re: Proposed Content Changes to the 1990 Census

Dear Mr. Arbuckle:

I am writing to express my deep concern over the deletions to the content of the 1990 Census of Population and Housing proposed by the Office of Management and Budget which would eliminate essential population and housing data vital to our functioning.

Detailed data from the Decennial U.S. Census represents the single most important statistical source for analytical studies that the Transportation Division of the New York City Department of City Planning undertakes. The foundation of all transportation planning is the journey-to-work trip and its concommitant origin and destination information. We must have a reliable source of such benchmark data, over time, to conduct the studies essential to evaluate improvement and development proposals, present plans and suggest policy for the city's continued growth and prosperity.

We have also found census data extremely reliable. It is an indispensible resource that we frequently use in checking data in EISs presented to us for evaluation as part of the mandated City Environmental Quality Review (CEQR) and the city's own Uniform Land Use Review Process (ULURP). This is unavailable from any other source. In addition, the short and long range studies undertaken as part of the Division's Subregional Work Program and UMTA Section 8 and FHWA technical studies, which are funded by the U.S. Department of Transportation, invariably make extensive use of Census data.

In particular, we wish to highlight the serious problems that would be caused if the following items were deleted.

Two Lafayette Street, New York, N.Y. 10007-1363, Room 2229, (212)566-8505
Lawrence Lennon, *Director*

Population

14. Residence 5 years ago. Population mobility and change is a vital factor in judging an area's degree of stability, along with other demographic data, and is particularly useful in evaluating off-street parking requirements and in predicting journey-to-work patterns.

21.b Hours worked last week. Information on part versus full-time employment directly related to transportation needs especially to analysis of peak hour requirements.

23-24 Transportation/time to work. This is the essential question for our transportation analysis work. Simply put, we cannot function without modal choice data. All the studies we undertake are closely tied to these questions. Further, the information on departure time and trip duration are the keystones in planning service levels and undertaking transit route analyses. The data on auto and van utilization gives us invaluable data on car pooling patterns. The city in carrying out its federally mandated measures to reduce air pollution must continue to receive this data in order to evaluate existing patterns versus realistic alternatives. The cost of upgrading existing transit facilities is enormous. The study of travel patterns is essential in prioritizing the expenditure of billions in capital funds. It is also integral to our efforts to offer additional transit privatization opportunities.

25-27 Labor Force. These are the basic questions which define whether an individual is in the labor force and in the journey-to-work flow. It is inconceivable that it could be dropped if we are to have a reliable benchmark picture of the total number of eligible workers in any locale. Areas of high unemployment provide special problems in predicting peak load transportation needs.

Housing

H 21. Number of Automobiles. This data is essential in planning for off-street parking needs as well as transit requirements in a complex city where car ownership varies widely.

In order for this Division to undertake its work program and such essential studies as forecasting and evaluating transportation/travel conditions and changes in travel patterns, including modal shares, temporal trip distribution, origins-and-destinations, detailed and accurate demographic data is necessary. The only complete and accurate source of this data is the decennial census and the invaluable cross tabulations it makes available.

We implore you to continue to collect this vital data so critical to the proper functioning of this or any of the nation's many transportation planning and operating agencies.

Sincerely,

Lawrence Lennon

Lawrence Lennon
Director

DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK
HOUSING AND ECONOMIC PLANNING

August 5, 1987

Ms. Wendy Gramm
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Ms. Gramm:

I am writing concerning the changes the Office of Management and Budget has proposed in the content of the 1990 Census of Population and Housing. A number of the proposed deletions from the questionnaire will seriously hinder the housing and economic planning studies of the Department of City Planning.

Residence 5 years ago - This is the only source of information on population movements into, and out of, New York City. The Department of City Planning uses this data, cross-tabulated with other census variables, to estimate housing demand by income class and household and family type. This in turn enables the Department to determine the number of newly-migrated households whose housing needs can be accommodated by the market, or who require subsidies.

Means of Transportation - The mode data in question 23 forms the basis for traffic analysis in all of the hundreds of environmental impact studies performed for the Department each year pursuant to federal and state laws. Question 23b is used by the Department to analyze the optional use of the automobile as a journey to work mode relative to parking requirements and to traffic volume at bottleneck points such as bridge-crossings and tunnels.

Labor force - Small-area census information on levels of unemployment, as would be collected by questions 25 and 26 is used in Department environmental impact studies to determine base socioeconomic conditions and evaluate changes that may be engendered by a proposed action.

Two Lafayette Street, New York, N.Y. 10007 - 1363, Room 2128, (212) 566-8218
Eric Kober, *Director*

Number of bedrooms - This question, cross-tabulated by household size, is used to document housing overcrowding, an important measure of present or potential blight.

Number of automobiles - Data on automobile availability is used to analyze small-area variations in parking demand and to derive cff street parking requirements for new developments.

I hcpe you will reconsider deleting these items in light of the critical need for these data.

Sincerely,

Eric Kober

Eric Kober

DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK
PLANNING MANAGEMENT AND SUPPORT
DIVISION OF COMMUNITY FACILITY AND CAPITAL PLANNING

August 6, 1987

Ms. Wendy Gramm
Office of Management and Budget
17th Street between PA Ave. & H St. NW
Washington, D.C. 20503

Dear Ms. Gramm:

We are deeply concerned about the proposed deletion of a number of questions from the 1990 Census of Population and Housing, many having been traditional elements of the census for the past few decades. The unavailability of migration, labor force and fertility information on a small area basis will seriously impact our ability to develop post-censal estimates and projections essential for our community facility planning and program development/evaluation activities. These data from the decennial census provide us with benchmark data and inputs for sensitivity tests.

1. Migration - The information generated from this question on residence five years earlier provides a base for the necessary migration assumptions needed for population projections. Coupled with other information, critical migration patterns can be ascertained. For example, using this data we were able to infer that 60 percent of the over one million net out-migration from New York City during the 1970's occurred during the first half of the decade and 40 percent during the second half (see chart on page 14 of the attached Capital Needs and Priorities Statement for 1987). These analyses permitted us to put into perspective the shift from a massive out-migration during the 1970's to a slight in-migration in the early 1980's. They also provide a base point from which to develop year 2000 population projections. Parallel analyses were also undertaken for the community districts.

Tabulations generated from this question have provided detail on the characteristics of the migrants into and out of the city such as age and education levels. Also, inter and intra-county flow data has been generated (see attached Report No.7 from Portrait of the City's Population series), as well as information on the characteristics of the "movers" vis-a-vis non-movers, information vital for planning.

Two Lafayette Street, New York, N.Y. 10007 - 1363, Room 2220, (212) 566-0832
Barbara Weisberg, *Assistant Executive Director*
Marvin D. Roth, *Director*, Rita Barrish, *Deputy Director*

2. Labor Force - The information on labor force participation and unemployment is essential to pinpointing local economic and social problems. Published small area data based on these questions made possible differential area analysis.

Labor force participation and unemployment by age/race/sex and other characteristics are important in the development plans for neighborhoods. For example, in Report No.6 from the Portrait series (see attached), we were able to highlight the differences in participation rates and unemployment among the different race/ethnic groups, especially among teenagers. Data relating to educational level were most helpful in documenting the importance of high school graduation.

Community district statistics helped pinpoint those areas of greatest concern. For example, information on women who are unemployed is essential in analyzing the needs for certain services such as day-care for children. In addition, labor force participation and unemployment data for small areas permit a number of sensitivity tests for our projections.

3. Fertility - The information on number of babies (Question 20) has permitted us to estimate the present status of an area in its life-cycle; e.g., nesters, empty-nesters, etc. This data is being used to develop differential fertility levels for sub-areas of the city for our population projections. With the recent slight up-turn in elementary school enrollments after a decade of decline, this material is a critical input in our review of a $4.5 billion school capital program being requested by the Board of Education. These data are a key element in the development of school enrollment projections for the 21st century.

I have attempted to illustrate, very superficially, how information derived from the mobility, labor force and fertility questions are being utilized in our demographic activities related to our community facility planning responsibilities. Please feel free to call me if you have any questions. Within the next week or so, the central office of the Department of City Planning will be moving to 22 Reade Street, New York, N.Y. 10007-1216; my new telephone number will be (212) 720-3459.

I would appreciate your reconsidering the proposal to drop these three questions.

Thank you.

Sincerely yours,

Marvin D. Roth

Marvin D. Roth

The City of New York
DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT
PAUL A. CROTTY, Commissioner
Office of Policy Analysis and Research
100 GOLD STREET, NEW YORK, N. Y. 10038
FELICE MICHETTI, First Deputy Commissioner
PHILLIP WEITZMAN, Assistant Commissioner

August 6, 1987

Donald R. Arbuckle
Office of Management and Budget
NEOB
17th St. between PA Ave. and H St., NW
Washington, DC 20503

Dear Mr. Arbuckle:

The attached is a set of official documents that illustrates how critical it is for the Department of Housing Preservation and Development (HPD) to be able to use census block and full-count tract data for most of the housing related items your office proposes to eliminate from either the 100-percent component or the sample component of the 1988 Dress Rehearsal Census (and therefore, the 1990 Census). The need for these data is continuous and extensive in order to:

(1) provide Federal and State agencies in funding applications with data and information on clearly measured housing needs for precisely delineated, very small target areas;

(2) prepare specific plans and projects relating to housing preservation, improvement, and/or development for specific areas that have unique and urgent housing and neighborhood needs;

(3) monitor, evaluate, and analyze in detail the impacts of HPD Policies and programs; and

(4) provide a standard or basis of comparison for assessing the quality of sample survey data and other housing related estimates made by local governments in the late 1980's and in the 1990's.

As the attached shows, the requirement of New York City and other cities for block data and full-count tract data is crucial. I thus request the Office of Management and Budget (OMB) to reconsider and to include the following basic housing characteristics in the 100-percent questionnaire for the 1990 census:

1. Items OMB proposes for the Sample Component:

   - number of rooms in unit (1990 Census Questionnaire Item H3)
   - complete plumbing facilities (H4)
   - tenure (H8)
   - condominium status (H5)
   - congregate housing (H10b)
   - date building built (H14)

2. Items OMB proposes to exclude from both the 100-Percent and Sample Components:

   - complete kitchen facilities (H19)
   - value of condominium or home (H9)
   - amount of monthly rent (H10a)

I would also request OMB to reconsider including the following items, which it proposes to exclude from both the 100-percent and sample components, in the sample component of the 1990 Census:

- fuel for heating home (H15)
- heating equipment (H16)
- fuel used for heating water (H17)
- costs of utilities and fuels (H18a-d)
- number of bedrooms (H20)
- date moved in (H22)
- real estate taxes (H23)
- fire, hazard and flood insurance (H24)
- mortgage (H25a-d)
- junior mortgage (H26)
- condominium fee (H27)

In addition to the above I also strongly recommend that items H5, H9, and H27, which refer to condominiums, should be reworded to include cooperatives as well.

Please do not hesitate to contact me if you need any additional information.

Sincerely,

Phillip Weitzman
Assistant Commissioner

cc: Felice Michetti
Kenneth Lowenstein
Moon Wha Lee
Dan Karus
Evelyn Mann
William P. Butz

NEED FOR CENSUS BLOCK AND FULL-COUNT TRACT DATA

Compiled by Office of Policy Analysis and Research
New York City Department of Housing Preservation and Development

1. Need for Census Block and Full-Count Tract Data for Applying for Funds

The experience of HPD's Home Repair Loan Program (HIP) underscores the necessity for statistically accurate housing condition data by census tract. To qualify for the use of CD funds, the program must be declared eligible under "Slums and Blight" criteria.

The definition of a slum or blighted area is delineated at 24 CFR 570.901(b)(2)(a). This definition is further refined recently, as below:

(1) Activities to address slum or blight on an area basis: An activity will be considered to address prevention or elimination of slum or blight in an area if:

(i) The area delineated by the recipient meets a definition of a slum, blighted, deteriorated or deteriorating area under State or local law;

(ii) Throughout the area there is a substantial number of deteriorated or deteriorating buildings or the public improvements are in a general state of deterioration;

(iii) Documentation is maintained by the recipient on the boundaries of the area and the condition which qualified the area at the time of its designation; and

(iv) The assisted activity is designed to address one or more of the conditions which contributed to the deterioration of the area....

As is evident, this definition is based upon housing conditions in an area. Furthermore, while it allows the locality to define a slum or blighted area under a local law, it requires that documentation be maintained on file that substantiates that delineation.

For the purposes of HIP, in order to meet these requirements, a declaration was issued designating certain areas as slummed, blighted, deteriorated, or deteriorating (see Attachment I). This document was based, in part, on 1980 full-count housing data by census block and tract. (The data included a series of housing indicators, by census tracts, a sample of which HPD previously provided to you.) Without accurate block data, HPD could not justify the inclusion of tracts that, on the face of it, had sound housing stocks. Block data can confirm the existence of substandard housing existing amidst a census tract's otherwise sound housing stock.

Similar data was also used by the State of New York Mortgage Agency (SONYMA) to qualify census tracts, statewide, as "Areas of Chronic Economic Distress." As such, the census tracts became eligible for SONYMA's tax-exempt bond financed forward commitment mortgage program, as can be seen in the attached tables (Tables 1 and 2).

In the absence of accurate housing-condition data by census tract and block, it would be almost impossible to target areas under "Slums and Blight" criteria with any precision or assurance that they would be deemed eligible by HUD. Instead, HPD would be compelled to delineate broader areas, containing extremes in housing conditions and income characteristics. Such disparities would seemingly belie HPD's claim that the areas, as a whole, were slummed and blighted.

It should be noted that it is common practice for Federal and State government agencies to require of potential grantees data on housing characteristics for specific target areas that can only be defined by census tract and block, as can be seen in Attachments II and III (Federal Rent Rehabilitation Grant Programs). The proposal to collect housing data on a sample basis goes contrary to these requirements, undermining efforts by government offices at all levels to define precisely housing needs and to target effectively scarce resources.

2. Need for Census Block and Full-count Tract Data for Development of Housing Plans

In efforts to identify and improve significantly housing situations in certain areas in the city, HPD frequently develops and/or improves small area plans. A good example of this type of use for full-count tract and block data is the comprehensive preservation plan for the Clinton area, shown in Attachment IV, Clinton:

A Plan for Preservation. The discovery and documentation of physically different areas within a relatively small neighborhood of the city clearly depend on data at the census tract level (see the "Existing Conditions" section of Attachment IV). With the help of census tract and block information, planners can pinpoint areas of widely differing housing stocks in a small geographic area that may not be apparent (and certainly are not documentable) without such small area data. Again, data for blocks and census tract areas are essential in order to define accurately housing needs and to utilize effectively scarce resources.

3. Need for Census Block and Full-Count Tract Data for Monitoring and Evaluating Impacts of Policies and Programs

HPD has been developing a computer mapping system designed to transform census block data on housing into maps demonstrating changes in geographic trends and patterns of housing situations resulting from HPD's policies and programs (see Attachment V). This system will further improve the agency's ability not only to understand and present the magnitude of housing problems in small areas, but also to monitor and evaluate more effectively the impacts of programs and policies that have been or are being implemented. Mapping is a rapidly growing housing planning and policy analysis tool that is being used by more and more public and private agencies throughout the country. In order to do any mapping or modelling detailed enough to be useful, small-area information is essential to accentuate identifiably different dynamic processes occurring at different times. Specifically, for mapping and modelling, it is necessary to have as complete census tract and block information as is possible in order to allow analysts the maximum flexibility in organizing data into meaningful areal configurations.

W3-8

The City of New York

DEPARTMENT OF EMPLOYMENT
220 CHURCH STREET
NEW YORK, N.Y. 10013

MANUEL A. BUSTELO
Commissioner

August 5, 1987

Ms. Wendy Lee Gramm, Administrator
Office of Information and Regulatory
Affairs
Office of Management and Budget
Old Executive Office Building
Washington, DC 20503

Dear Ms. Gramm:

I am writing to express my concern about certain changes that OMB proposes for the 1990 Census. I am specifically concerned with the elimination of labor force as a concept through the deletion of questions traditionally used to determine labor force participation and unemployment levels.

The New York City Department of Employment administers Job Training Partnership Act funds to provide employment training services for economically disadvantaged persons. These services are performed through a network of community based organizations situated in local areas of high unemployment and poverty.

Given its mission, local area labor force data are crucial for the Department to determine service needs efficiently, allocate resources and select training sites. In particular, the Department uses sub-area, community-district, unemployment levels to assess the relative needs of each district and to geographically distribute services. Similarly, labor force participation rates enable the Department to measure which population groups are more likely to need employment training services.

In short, labor force data are essential for the Department to perform its mission effectively. I strongly urge you to reconsider the deletion of those questions which would, for all practical purposes, eliminate such vital statistics as unemployment and labor force participation.

Very truly yours,

Thomas A. McEnery/dl

Thomas A. McEnery
Acting Commissioner

TAM:CG:ab

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August 6, 1987

Dorothy Tella
Office of Management and Budget
New Executive Office Building
726 Jackson Place NW
Washington DC 20503

Dear Ms. Tella,

We understand that your agency has proposed dropping most of the transportation-related questions from the 1990 Census. As transportation planners responsible for framing future policy decisions impacting the 5.7 million daily riders who use New York area subways, buses, and commuter railroads, we find this a chilling prospect.

One of our major objectives is to improve the cost effectiveness of our system in the future by better matching the delivery of service to ridership demand. The Census work trip questions are the only consistent, continuing source of data describing the riders within our service area. Mass transit demand is journey-to-work driven, therefore it is imperative that we have access to home-based work travel data from the 1990 Census.

We strongly urge the Office of Management and Budget to withdraw the proposal that the Bureau of the Census eliminate any of the existing questions about travel patterns from the decennial Census. The value of the transportation-related data derived from the Census to local, state and national transportation policymakers far outweighs any cost savings that could be achieved.

Sincerely,

Gregory Johnson
Director Planning

cc: Sen. Moynihan
✓Evelyn Mann

Senator SARBANES. Does any one of you have any theory as to why OMB has done this? Why have they thrown the whole process of developing the census questionnaire into turmoil, really in the closing moments of the process of going forward to the dress rehearsal—after they've been at it for 3 years?

I mean, you know, the doubts about questions could have been voiced early on and properly examined and considered.

Do you have any theory on that?

Mr. JACKSON. I don't know why, but I certainly would agree that they have thrown the process into turmoil. And that to proceed in the direction which they're going will certainly make things very difficult for local government planners and for the people who live in the communities, which is everyone in the country.

Senator SARBANES. Have the members of the National Association of Counties and of the National League of Cities been in touch with the OMB, do you know?

Ms. KEETON. I think that we have only, the National Association of Counties, have only in this week put together their statement. But we will be encouraging the National Association of Counties as well as submitting it ourselves to them.

And I do know the Maryland counties have begun that process.

Senator SARBANES. There hasn't been much time and they've really put you in an extraordinarily restricted timeframe. But I think it's very important that they hear from you.

How about the National League of Cities?

Mr. JACKSON. Yes. I've just been informed that the National League of Cities has, indeed, contacted the White House and several Federal agencies. And it is my understanding that, as a result of this contact, apparently, the date for comment has been moved back to August 30.

Is that correct?

Ms. KEETON. Well, good.

Senator SARBANES. I see the OMB people saying it's not correct.

Ms. PICOULT. It was a—there was a misconception about what the deadline was. I think that's one of the problems that arose. And I've been talking to a lot of people that have been calling me today and saying—they called me during the day, "Is August 7 the deadline?"

That's when we asked the Census Bureau to provided us with additional justification. But, under the Paperwork Reduction Act, you have 60–90 days.

So I told them——

Senator SARBANES. Its 60 or 90 days from the 24th of July?

Ms. PICOULT. No, they had 60 or 90 days from June 17.

Senator SARBANES. Why is June 17 the pertinent date?

Ms. PICOULT. That's when it arrived at OMB for review, the dress rehearsal arrived.

Senator SARBANES. Yes.

Ms. PICOULT. It was submitted to OMB for review——

Senator SARBANES. Yes.

Ms. PICOULT [continuing]. On June 17. The clock starts running——

Ms. GONZALEZ. June 17.

Senator **Sarbanes**. And that begins the clock on public comment?

Ms. **Picoult**. Right, that's the clock on our review under the Paperwork Reduction Act.

Senator **Sarbanes**. And public comment?

Ms. **Picoult**. And public comment.

Senator **Sarbanes**. All right, now what happens if you take 59 days?

Ms. **Picoult**. We have——

Senator **Sarbanes**. You being OMB. And then make this kind of comment. What happens to the public in terms of their comments?

I'm a member of the public and I'm sitting out there and the Census Bureau sends me this questionnaire. I review the questionnaire and I say, well, it looks pretty good. They had to make some tough decisions. I'm not completely happy with it. There were a couple of questions I thought should have been in that they didn't include.

Then, all of a sudden, OMB comes down and says, well, we're going to knock out the major portion of this questionnaire, close to the end of the period. Actually, you used up 30 days—more than 30 days—of the period as it was. You could have used up more.

And that, it seems to me, leaves the private sector in very restricted timeframe in order to comment.

Ms. **Picoult**. We have the authority to extend our review an additional 30 days on a——

Senator **Sarbanes**. Of course, the trouble with that in this instance is, if you extend it, you're up against the timetable for the dress rehearsal.

Ms. **Gonzalez**. No, the 30 days takes us to September 15.

Senator **Sarbanes**. Yes, working off the June 17 date.

Ms. **Gonzalez**. Working off June 17.

Senator **Sarbanes**. I'm submitting to you that the more pertinent date is July 24, which is when the public knew that there was trouble with this questionnaire.

How am I to know? I look at it and say, "That's a pretty good questionnaire. No problem. I don't have any comment to make. The process is moving forward."

At that point, OMB puts a 60-day period—or let's assume even a 90-day period on it.

Ms. **Picoult**. Well, that's, in fact, a statutory deadline. We don't have any discretion on that.

Senator **Sarbanes**. All right. So, at that point, there is 60 days for you to comment, and 60 days for the public to comment.

Ms. **Picoult**. That's right.

Ms. **Gonzalez**. The comment period can go through 90 days, but if the comment arrives on the 90th day, they come after——

Senator **Sarbanes**. Well, you used up 37 of the days before anyone recognized that there was any problem, as far as the public is concerned.

I mean, I'm a member of the public. I don't think there's any problem with the census questionnaire because I think that, as submitted, it's pretty good. The 60-day period starts running; I have no intention of making a comment—National Association of Counties has their meeting and says fine. We're concerned about the census questionnaire, but it seems to be coming along fine.

And then, all of a sudden, a crisis emerges. Chaos develops because OMB itself, which has been in this planning process for 3 years, is all of a sudden prepared to knock out a significant part of the questionnaire. Yet the time for these public agencies and private citizens to comment has been running.

Ms. PICOULT. Now, we are creating a public record during the whole time——

Senator SARBANES. Yes, we are. I would agree with that. [Laughter.]

Ms. PICOULT. You know, the comments from our July 24 meeting are in a public record where any citizen can walk in and see, and there is nothing secretive about what we've done; the questions that we've raised are all open to the public.

The other thing is that there is a notice that's sent to the Federal Register by the agency informing the public of the OMB review and inviting people to comment.

And that notice was published by the Census Bureau in the Federal Register on June 22. I realize every private citizen didn't sit down and pick up their Federal Register and say, well, we'll see what's going on today, what I can comment on.

But, it encourages more public participation. We hope we're going to get, you know, favorable comments as well as, you know, ones critical of various aspects of this form.

We do everything we possibly can to encourage the public to participate.

Senator SARBANES. Well, let me thank the panel very much. We appreciate your help. These are very thoughtful statements and they've been very constructive. And again, we're particularly appreciative for your staying through a long, long hearing.

Thank you very much.

The hearing is adjourned.

[Whereupon, at 1:30 p.m., the committee adjourned, subject to the call of the Chair.]

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